

CITGO FACILITY  
I.1: REMOVAL ACTION  
CORRESPONDENCE GENERAL

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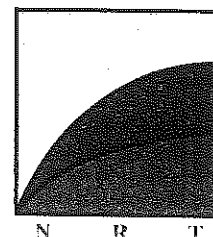
**CITGO PETROLEUM CORPORATION  
ARLINGTON HEIGHTS, ILLINOIS**

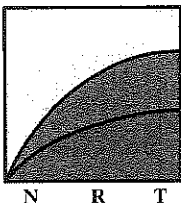
**SITE INVESTIGATION REPORT**

**CITGO EAST CHICAGO TERMINAL  
2500 EAST CHICAGO AVENUE  
EAST CHICAGO, IN 46312**

**PROJECT NO. 1195**

**Natural  
Resource  
Technology**





**Natural  
Resource  
Technology, Inc.**

**SITE INVESTIGATION REPORT**

**CITGO EAST CHICAGO TERMINAL  
2500 EAST CHICAGO AVENUE  
EAST CHICAGO, INDIANA**

**Project No. 1195**

**Prepared For:**

**CITGO Petroleum Corporation  
2316 Terminal Drive  
Arlington Heights, IL 60065**

**Prepared By:**

**Natural Resource Technology, Inc.  
23713 W. Paul Road, Unit D  
Pewaukee, WI 53072**

**November 7, 1997**

**Timothy E. Mueller, P.G.  
Hydrogeologist**

**Katherine M. Juno, P.G.  
Senior Geologist**

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# EXECUTIVE SUMMARY

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Natural Resource Technology, Inc. (NRT) was retained by CITGO Petroleum Corporation (CITGO) to perform a site investigation at Dikeyard 4 of the CITGO Terminal facility located at 2500 East Chicago Avenue (State Highway 312) in East Chicago, Indiana. The investigation was conducted in response to an on-site release of turbine fuel discovered on May 14, 1996 from the fill and transfer fuel piping near Tank #4 and along the adjacent right-of-way (ROW) to the south. The suspected fill line was taken out-of-service and replaced with a new fill line. CITGO excavated and dewatered a portion of the spill area to aid in the identification and repair of the fill line. CITGO reported the release to the Indiana Department of Environmental Management (IDEM) Emergency Response on May 14, 1996. The release was reported as less than 100 gallons of turbine fuel and contained on the CITGO site. IDEM stated to NRT on September 24, 1996 that a written response to the release notification will not be provided to CITGO as the IDEM considers this release to be a minor incident based on the volume of the release (less than 100 gallons) and since a release to off-site property was not reported. IDEM release number 9605119 was assigned to the site.

The objectives of the site investigation were to determine the presence or absence of free-phase product (turbine fuel) in the identified spill area; evaluate the lateral extent of hydrocarbon impacts to soil and groundwater on the site and on the adjacent ROW; determine soil type and groundwater depth, flow direction, hydraulic gradient, and velocity. NRT advanced 17 soil borings within and outside the spill area to evaluate the lateral extent of soil and groundwater impacts on the site and the adjacent ROW to the south. Soil and groundwater samples were collected and analyzed for polynuclear aromatic hydrocarbons (PAHs) to delineate the extent of impacts. Analytical results indicate that the extent of petroleum-impacted soils and groundwater related to the turbine fuel release is defined on the subject property and extends off-site onto the adjacent south ROW, but not reaching East Chicago Avenue. The majority of the site (impacted area) is restricted from public access by fencing along the ROW. Due to the shallow depth of soil impacts (less than two feet), a small portion of the contamination present adjacent to the buried fuel lines is accessible to the public and utility workers on the ROW. The detected levels of naphthalene and benzo(a)pyrene are below their respective risk-based screening levels (RBSLs) presented in the American Society for Testing and Materials (ASTM) *Standard Guide E 1739-95 for Risk-Based Correction Action Applied at Petroleum Release Sites*. These RBSLs are risk-based correction action target levels established by ASTM for chemicals of concern, in this case for naphthalene and benzo(a)pyrene. These ASTM RBSLs were relied upon, since direct contact and soil leachate values are currently not established by the IDEM, nor were calculated as part of this investigation.

Impacts to groundwater were detected as dissolved-phase, non-carcinogenic PAHs present predominantly on site. No free-phase product was encountered during this investigation. The detected levels of naphthalene and benzo(a)pyrene are below their respective ASTM RBSLs for ingestion pathway at industrial sites.

Groundwater flow data and analytical data indicate that the plume is migrating toward the west-northwest (toward Tank #4) under a low hydraulic gradient and moderate groundwater velocity. Based on this and the low mobility of PAHs, the portion of the plume detected on the site is expected to remain on the site. Impacts detected off-site on the ROW are expected to migrate under the same conditions on the ROW and onto the site.



# 1 INTRODUCTION

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## 1.1 Overview

Natural Resource Technology, Inc. (NRT) was retained by CITGO Petroleum Corporation (CITGO) to perform a site investigation at Dikeyard 4 of the CITGO Terminal facility located at 2500 East Chicago Avenue (State Highway 312) in East Chicago, Indiana (Figures 1 and 2). The investigation was conducted in response to a release of turbine fuel at the site. This report describes the scope of work, presents the results of the investigation, and provides conclusions based on the results.

## 1.2 Background

The turbine fuel release was discovered on May 14, 1996 from the fill and transfer fuel piping located in the southeast corner of Dikeyard 4 (Tank #4) and along the adjacent right-of-way (ROW) to the south. Figures 2 and 3 show the investigation area relative to the tank location and ROW. The release was the apparent result of a leak from an underground, 16-inch diameter turbine fuel fill line. The suspected fill line was taken out-of-service and pressure tested to determine the location of the leak. A portion of the fill line failed the pressure test and was abandoned and replaced with a new fill line. CITGO excavated and dewatered a portion of the spill area to aid in the identification and repair of the fill line.

Following the repair of the piping and the recovery of the product, CITGO reported the release to the Indiana Department of Environmental Management (IDEM) Emergency Response on May 14, 1996. The release was reported as less than 100 gallons of turbine fuel and contained on the CITGO site. IDEM stated to NRT on September 24, 1996 that a written response to the release notification will not be provided to CITGO as the IDEM considers this release to be a minor incident based on the volume of the release (less than 100 gallons) and since a release to off-site property was not reported. IDEM release number 9605119 was assigned to the site.

## 1.3 Project Contacts

Project contacts include the following:

CITGO Contact:

CITGO Petroleum Corporation  
2316 Terminal Drive  
Arlington Heights, Illinois 60065  
Attention: Mr. Scott Buckner (847) 437-3463

Environmental Consultant:

Natural Resource Technology, Inc.  
23713 West Paul Road, Unit D  
Pewaukee, Wisconsin 53072  
Attention: Mr. Tim Mueller (414) 523-9000

## 1.4 Objectives

The objectives of the site investigation included the following:

- Determine the presence or absence of free-phase product (turbine fuel) in the identified spill area of Dikeyard 4;
- Evaluate the lateral extent of hydrocarbon impacts to soil and groundwater on the site and on the adjacent ROW to the south along East Chicago Avenue (State Highway 312);
- Determine soil type and groundwater depth, flow direction, hydraulic gradient, and velocity; and,
- Prepare a site investigation report for submittal to CITGO.

## 2 SOIL BORINGS AND SAMPLING

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### 2.1 Soil Borings and Soil Sampling

On December 3 and 4, 1996, NRT advanced 17 soil borings within and outside the spill area to evaluate the lateral extent of soil and groundwater impacts on the site and the adjacent ROW to the south. The soil borings were drilled using a hydraulic probe device to depths ranging between 8 to 12 feet below the ground surface (bgs). Soil boring locations are shown on Figure 3.

Soil samples were collected continuously at two foot intervals from each soil boring for soil classification and field screening for volatile organic vapors. Characterization of the soil samples was performed in accordance with the Unified Soil Classification System (USCS). Field screening of soil samples was performed using a photoionization detector (PID) equipped with a 11.7 eV lamp. Field screening samples were prepared by placing the sample in a one-quart glass container, then covering the container with aluminum foil, and allowing the sample to equilibrate to room temperature. The probe of the PID was then inserted through the foil and the peak response was recorded. Characterization of soil boring samples and field screening results are described on the soil boring logs included in Appendix A.

One soil sample from each boring was prepared for potential laboratory analysis of polynuclear aromatic hydrocarbons (PAHs). Only unsaturated soils were considered for potential laboratory analysis. Due to the presence of a shallow groundwater (approximately 1½ to 2 feet bgs), soil samples collected from a depth of 0 to 2 feet bgs were prepared for potential analysis. Based on field screening PID results, four soil samples, collected from the soil borings, were submitted for PAH analysis to SPL Environmental Laboratories, Inc. (SPL) in Traverse City, Michigan. Soil analytical reports are included in Appendix B.

## **2.2 Groundwater Sampling**

During completion of the soil borings, groundwater samples were collected from 15 of the 17 soil borings and analyzed for PAHs to delineate the extent of groundwater impacts and to strategically determine locations for permanent groundwater monitoring wells. Groundwater samples were collected from temporary wells consisting of dedicated, plastic tubing and slotted, stainless steel sampling points inserted in the hydraulic probe borings. All sampling equipment was decontaminated between sampling events, and new plastic tubing was used at each groundwater sample location. Groundwater samples were extracted from the probe screen using a peristaltic pump and submitted to SPL for PAH analysis using USEPA Test Method 8310. Groundwater analytical reports are included in Appendix C.

All boreholes were abandoned in accordance with Indiana Administrative Code (IAC) 310 following the collection of soil and groundwater samples. Soil and groundwater investigative wastes by the investigation were contained in 55 gallon drums for future disposal.

## **3 GROUNDWATER MONITORING WELLS**

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### **3.1 Monitoring Wells**

Three monitoring wells (MW-1, MW-2, and MW-3) were installed by NRT on December 4, 1996 to evaluate the lateral extent of on-site groundwater impacts and monitoring purposes. The wells were installed using hollow stem augers and constructed as four-inch diameter polyvinyl chloride (PVC) wells designed for groundwater recovery purposes, if needed. Each monitoring well was installed to a total depth of 11 feet bgs completed with a 10 foot screen designed to intersect the shallow water table. The wells were installed in accordance with IAC 310 by a licensed Indiana well driller. Well construction details are included as Appendix D. Well elevations were surveyed by NRT following the installation of the monitoring wells.

Monitoring well MW-1 was installed at the north extent of groundwater impact indicated by the groundwater sampling data collected from the temporary wells. Monitoring wells MW-2 and MW-3 were installed in areas of groundwater impacts near the source area to allow for the recovery of potential free-phase product, if present. Approximately three weeks following installation, the monitoring wells were developed by surging with a bailer and pumping with a submersible pump. All groundwater purged during the development activities was placed in 55 gallon steel drums for potential future disposal.

### **3.2 Soil and Groundwater Sampling**

One soil sample was collected from well boring MW-3 and analyzed for PAHs by SPL. Approximately three weeks following the installation of the monitoring wells, one round of groundwater samples were collected and submitted for PAH analysis. Approximately three to five well volumes of water were purged from each well prior to groundwater sampling. Groundwater depths and the potential for free-phase product were measured in each well prior to

sampling. Soil and groundwater analytical reports are included in Appendices B and C, respectively.

### **3.3 Field Hydraulic Tests**

All three monitoring wells were hydraulically tested by baildown recovery and analyzed using the Bouwer and Rice method to characterize the hydraulic properties of the unconsolidated deposits. From the test data, NRT calculated hydraulic conductivities and groundwater flow velocities in the shallow aquifer at each well location. This data will aid in the evaluation of remedial action alternatives, if warranted. Baildown recovery (slug) test results are included in Appendix E. Groundwater levels were measured in each monitoring well prior to groundwater sampling. A horizontal hydraulic gradient was calculated based on the measured groundwater levels. Hydraulic gradient and groundwater velocity calculations are included in Appendix F.

## 4 INVESTIGATION RESULTS

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### 4.1 Soil Sample Analyses

Soils were predominantly fine to medium sands extending to at least 12 feet bgs. PID soil screening results indicated the presence of organic vapors in shallow-depth (0 to 2 feet) soils extending less than 80 feet to the north and northwest and less than 40 feet to the south, east, and west directions from the release area (turbine transfer pipe near boring SB-15). PID readings were detected in off-site soil samples SB-12 and SB-13 located at the property boundary, but not in samples collected further off-site to the south in borings SB-9 and SB-10 (Figure 3). PID responses ranged from 24 to 481 instrument units (IU), with the highest responses detected at and near the source area (turbine pipe area) and decreasing laterally away from the release.

Soil analytical results are also depicted on Figure 4. Soil analytical results indicated total PAH impacts in soils (0 to 2 feet) in the release area ranging from 73,821 to 195,721 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ), and naphthalene concentrations ranging from 11,000 to 25,000  $\mu\text{g}/\text{kg}$ . The two off-site soil samples (SB12-1 and SB13-1), collected within the ROW to the south, contained the highest total PAH and naphthalene concentrations. Total PAHs and naphthalene concentrations in soil sample SB1-1, collected north of the release area, were reported at 286 and less than 60  $\mu\text{g}/\text{kg}$  (below detection), respectively. The concentrations detected in soil sample SB1-1 were significantly lower compared to the PAH concentrations detected in the other four samples. Table 1 and Figure 4 summarize the soil analytical results.

### 4.2 Groundwater Sample Analyses

Table 2 and Figure 5 summarizes the groundwater analytical results. Groundwater analytical results are also depicted on Figure 5. Groundwater sampling results from the temporary and permanent monitoring wells indicate total PAH concentrations ranging from 6 to 904  $\mu\text{g}/\text{L}$  in groundwater samples collected from on-site wells and 6 to 7  $\mu\text{g}/\text{L}$  in the samples collected from

off-site temporary wells. Detectable concentrations of naphthalene ranged from 6 to 300 µg/L. The highest PAH and naphthalene concentrations were detected in the samples collected from on-site temporary wells SB-6 and SB-15, both of which are located in the proximity of the release (Figure 5). Off-site groundwater impacts were very low relative to PAH impacts detected in groundwater samples collected from on-site wells. PAH compounds detected during this sampling event included naphthalene, acenaphthylene, fluorene, 1-methylnaphthalene, and 2-methylnaphthalene.

No free-phase product was encountered during the drilling and sampling phase of this investigation.

### 4.3 Cleanup Criteria Pertinent to Site

At present, soil and groundwater cleanup standards for petroleum hydrocarbons are to background levels. The IDEM is currently preparing a draft guidance document which will establish risk-based soil and groundwater remediation criteria. The draft guidance document is based on *ASTM Standard E 1739-95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*, and also considers remediation by natural attenuation and other similar state programs. The draft document is scheduled to be completed for public comment by October 24, 1997. The IDEM anticipates the document to become final for implementation by March 1998. Information provided by the IDEM (August 1997) indicates that PAHs which will drive soil and groundwater cleanup include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene. These seven PAHs are classified by the USEPA as probable human carcinogens. Naphthalene is being considered for addition to this list, primarily on the basis of its significantly higher solubility relative to other PAHs. Soil cleanup levels will be provided on "Look-up Tables" currently being prepared by the IDEM. Draft copies of the Look-up Tables are not currently available.



Drinking water maximum contaminant levels (MCLs) for the carcinogenic PAHs are currently being used by the IDEM as a guideline to enforce groundwater cleanup to background levels. None of the seven carcinogenic PAHs were detected in the groundwater samples collected during this investigation

## 4.4 Groundwater Flow

Groundwater level measurements collected by NRT on December 26, 1996 from the three on-site monitoring wells indicated a west-northwest groundwater flow direction (Figure 6). Depth to groundwater at the site on December 26, 1996 ranged from between 1 1/2 to 2 feet bgs. CITGO terminal representatives indicated that the water table occasionally reaches ground surface. Table 3 summarizes the measured groundwater depths and elevations.

A slight horizontal groundwater gradient was calculated across the investigation area at 0.0044 feet/foot to the west-northwest. The hydraulic gradient calculation is presented in Appendix D.

Results of the baildown recovery tests indicated hydraulic conductivities (K) in the shallow groundwater ranging from  $1.44 \times 10^{-3}$  feet/minute ( $7.31 \times 10^{-4}$  centimeters per second, cm/s) to  $2.34 \times 10^{-3}$  feet/minute ( $1.18 \times 10^{-4}$  cm/s). Graphical output of the baildown recovery data are included in Appendix C. The estimated K values are comparative to average values for sand (Freeze and Cherry, 1979). Estimated K values are consistent for soils screened by the monitoring wells.

Based on the calculated hydraulic conductivities, the calculated average linear groundwater flow velocity at the water table was  $3.8 \times 10^{-5}$  feet/minute ( $2.0 \times 10^{-5}$  cm/sec) or approximately 20 feet per year. Groundwater flow velocity calculations are included in Appendix D.

## 5 CONCLUSIONS

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### 5.1 Soil Impacts

Analytical results indicate that the extent of petroleum-impacted soils related to the turbine fuel release is defined on the subject property and extends off-site onto the adjacent south ROW, but not reaching East Chicago Avenue. Based on the nature of the release (occurring below ground) and high water table, soil impacts above the water table are likely attributed to a fluctuating water table. The IDEM interprets soil contamination to occur within both unsaturated and saturated soil.

The majority of the site (impacted area) is restricted from public access by fencing along the ROW. The detected levels of naphthalene and benzo(a)pyrene are below their respective risk-based screening levels (RBSLs) presented in the American Society for Testing and Materials (ASTM) *Standard Guide E 1739-95 for Risk-Based Correction Action Applied at Petroleum Release Sites*. These RBSLs are risk-based correction action target levels established by ASTM for chemicals of concern, in this case for naphthalene and benzo(a)pyrene. These ASTM RBSLs were relied upon, since direct contact and soil leachate values are currently not established by the IDEM, nor were calculated as part of this investigation. Due to the shallow depth of soil impacts (less than two feet), a small portion of the contamination present adjacent to the buried fuel lines is accessible to the public and utility workers on the ROW.

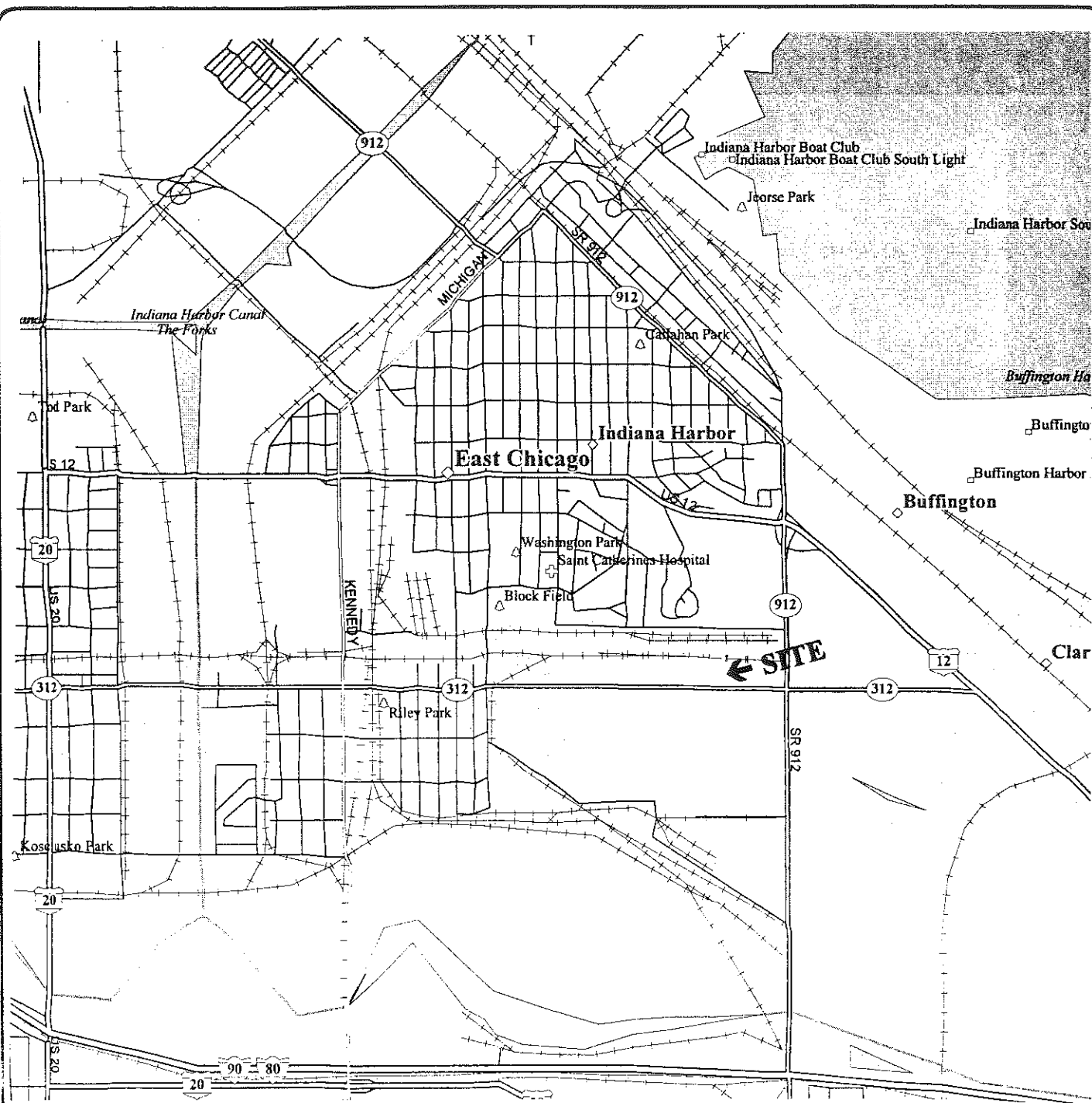
The on-site earth berms located to the south and east of the site investigation area will prevent surficial drainage onto the adjacent ROW during times when the water table reaches ground surface. As indicated in this report, the fill line was pressure tested and a portion was replaced to prevent future releases.

## 5.2 Groundwater Impacts

Impacts to groundwater were detected as dissolved-phase, non-carcinogenic PAHs present predominantly on site. No free-phase product was encountered during this investigation. Groundwater analytical results indicate that the north, west, and east extent of the release is defined. The greatest levels of groundwater impact were detected on-site in the release area in the proximity of the above grade transfer and fill fuel lines. Low levels of naphthalene were detected in groundwater samples collected off-site within the ROW approximately 15 feet east and west of the buried fuel lines. The detected levels of naphthalene and benzo(a)pyrene are below their respective ASTM RBSLs for ingestion pathway at industrial sites.

Groundwater flow data and analytical data indicate that the plume is migrating toward the west-northwest (toward Tank #4) under a low hydraulic gradient and moderate groundwater velocity. Based on this and the low mobility of PAHs, the portion of the plume detected on the site is expected to remain on the site. Impacts detected off-site on the ROW are expected to migrate under the same conditions on the ROW and onto the site.

## FIGURES



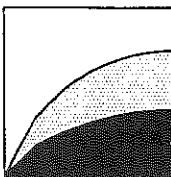
SOURCE: DeLORME MAPPING  
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Scale

2000 Feet

1000 Meters



Natural  
Resource  
Technology

## SITE LOCATION MAP

CITGO PETROLEUM CORPORATION  
EAST CHICAGO TERMINAL  
EAST CHICAGO, INDIANA

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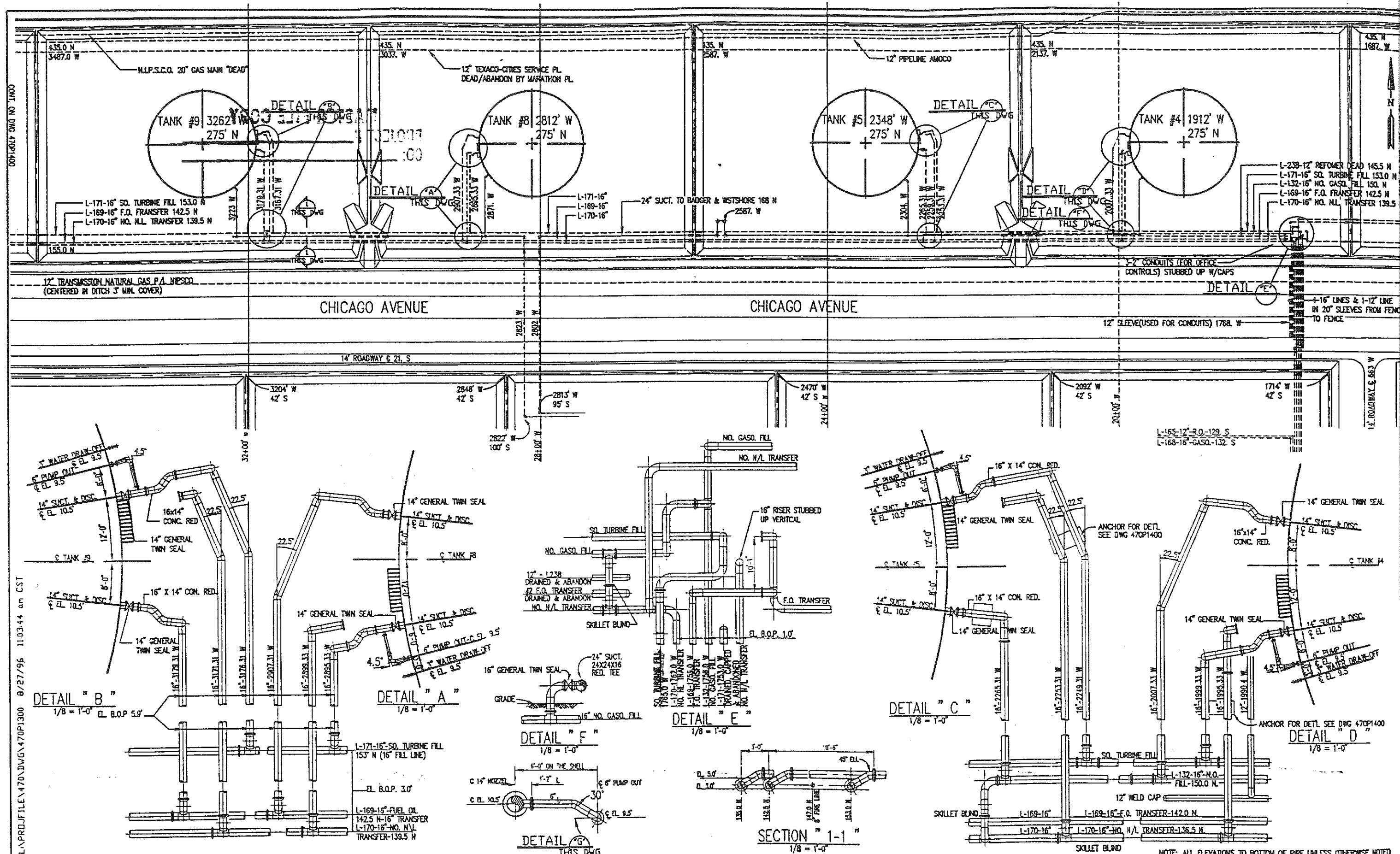
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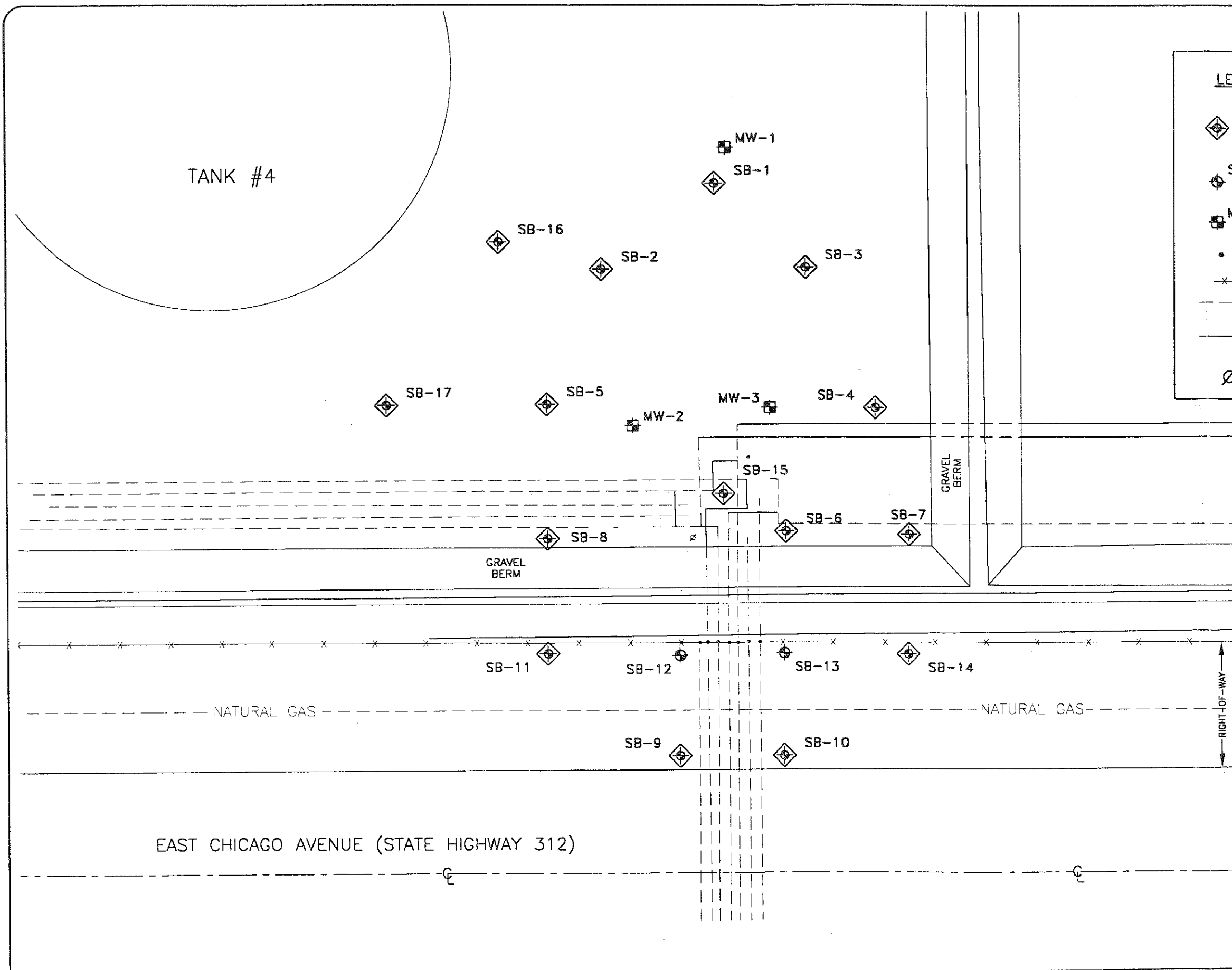
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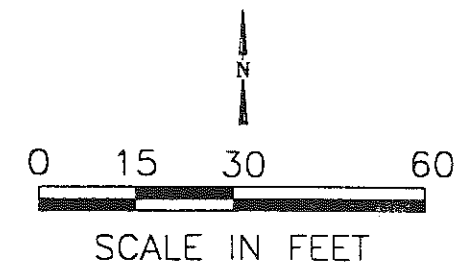
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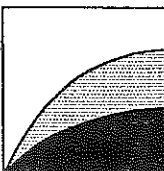
**LEGEND**

- SB-1 SOIL BORING WITH GROUNDWATER SCREENING SAMPLE
- SB-12 SOIL BORING
- MW-1 MONITORING WELL
- PIPELINE VENT
- FENCE
- UNDERGROUND FUEL PIPING
- ABOVE GRADE FUEL PIPING
- UTILITY POLE



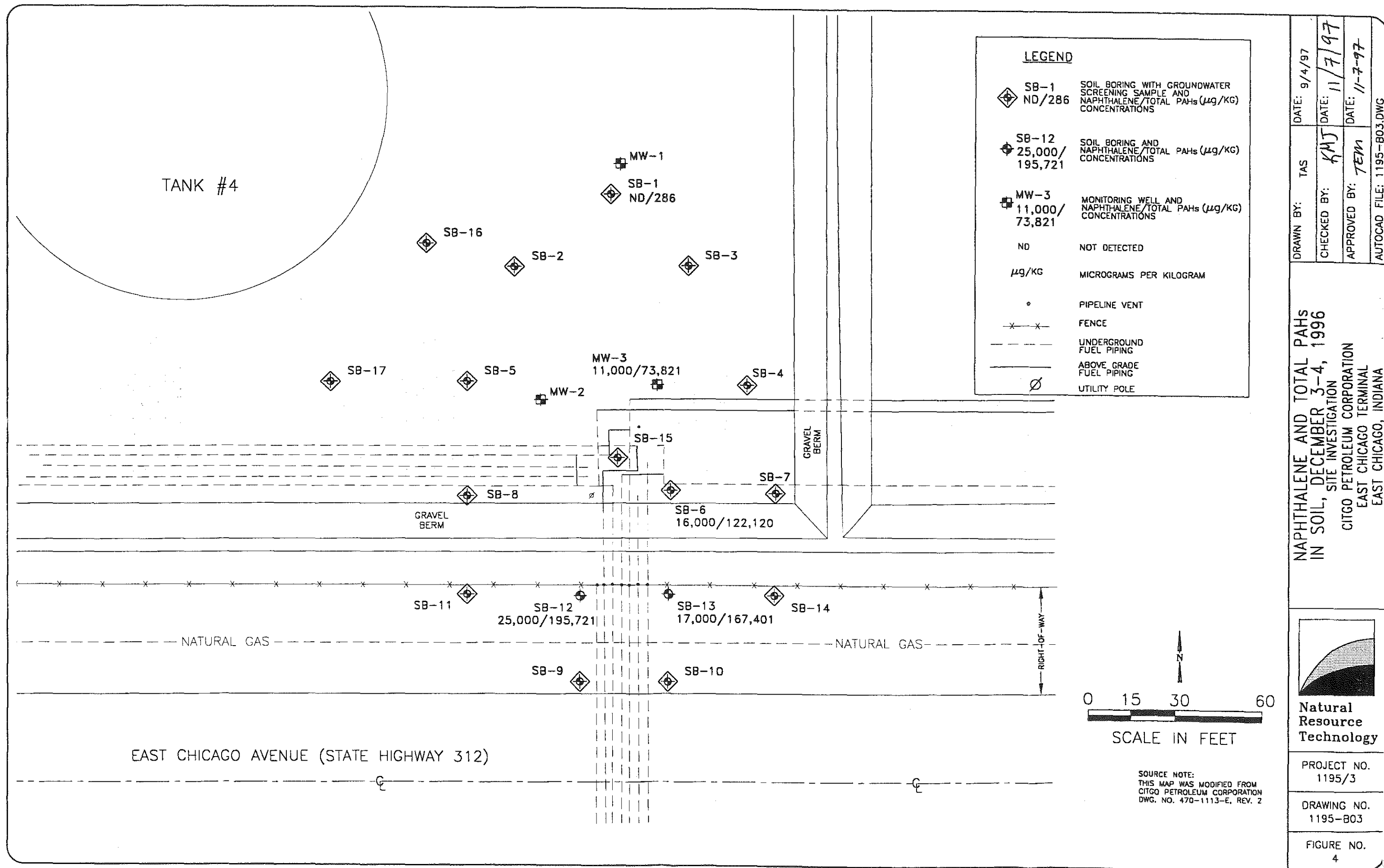
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CITGO PETROLEUM CORPORATION  
DWG. NO. 470-1113-E, REV. 2

<p><b>SITE MAP</b></p> <p>SITE INVESTIGATION</p> <p>CITGO PETROLEUM CORPORATION</p> <p>EAST CHICAGO TERMINAL</p> <p>EAST CHICAGO, INDIANA</p>	DRAWN BY:	TAS	DATE:	9/4/97
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	APPROVED BY:	JEM	DATE:	11-7-97
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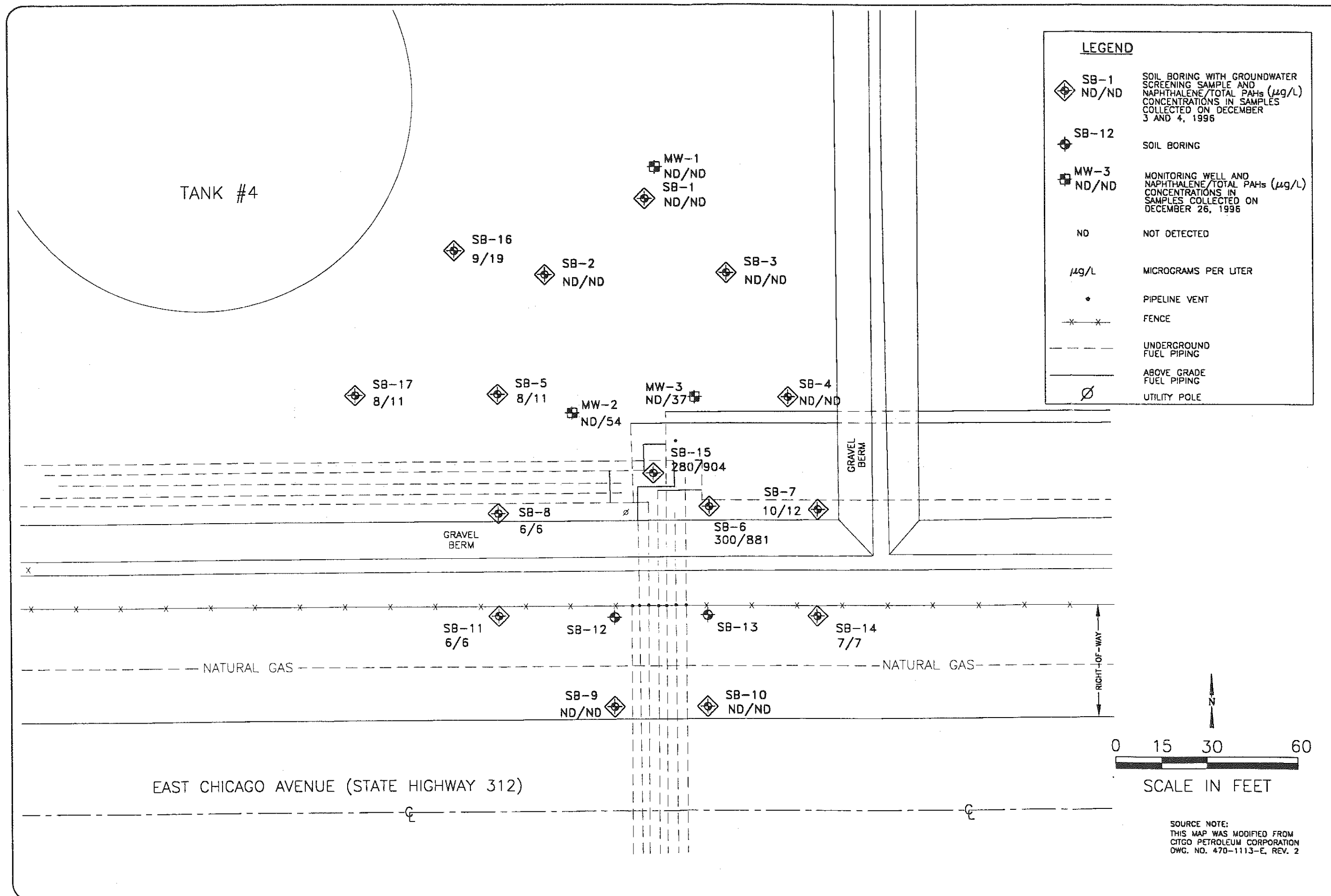


**Natural Resource Technology**

PROJECT NO. 1195/3
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FIGURE NO. 3







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**NAPHTHALENE AND TOTAL PAHs IN GROUNDWATER, DECEMBER 26, 1996**

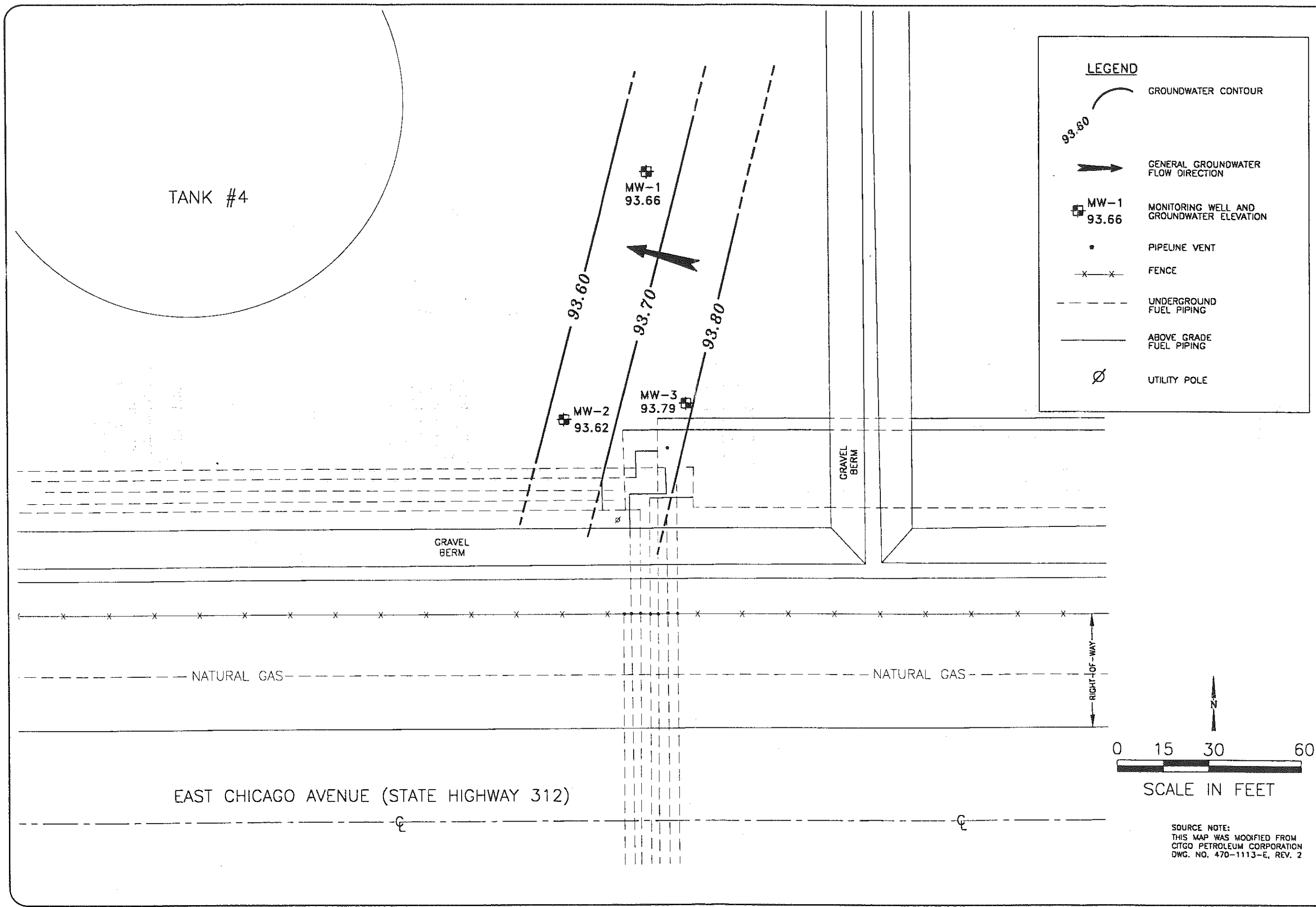
**SITE INVESTIGATION**

CITGO PETROLEUM CORPORATION  
EAST CHICAGO TERMINAL  
EAST CHICAGO, INDIANA

**PROJECT NO. 1195/3**

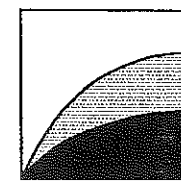
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**FIGURE NO. 5**



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**GROUNDWATER FLOW MAP**  
**DECEMBER 26, 1996**  
**SITE INVESTIGATION**  
**CITGO PETROLEUM CORPORATION**  
**EAST CHICAGO TERMINAL**  
**EAST CHICAGO, INDIANA**



**Natural  
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**PROJECT NO.**  
1195/3

**DRAWING NO.**  
1195-B02

**FIGURE NO.**  
6

## **TABLES**

Table 1

Soil Analytical Summary - PAHs  
 Site Investigation - CITGO East Chicago Terminal  
 East Chicago, Indiana

Sample Name/Location	Sample Depth (feet)	Sampling Date	PID Reading (ppm)	Product Odor	Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Chrysene	Benzo(a)anthracene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Dibenzo(a,h)anthracene	Benzo(g,h,i)perylene	Indeno(1,2,3-cd)pyrene	1-methylnaphthalene	2-methylnaphthalene	Total PAHs
SB1-1	0-2	12/3/96	nd	no odor	nd	nd	nd	nd	nd	nd	nd	nd	6	6	nd	nd	nd	nd	nd	nd	180	94	286
SB6-1	0-2	12/3/96	380	strong	16000	4100	3500	1300	1500	400	nd	nd	260	60	nd	nd	nd	nd	nd	nd	33000	62000	122120
SB-12-1	0-2	12/4/96	225	strong	25000	8000	5200	1800	1900	280	190	nd	130	70	28	nd	24	11	70	18	58000	95000	195721
SB-13-1	0-2	12/4/96	320	strong	17000	6300	4300	1500	1600	230	150	nd	130	62	31	7	21	12	58	nd	44000	92000	167401
MW3-1	0-2	12/4/96	nm	slight	11000	3900	3700	1300	1700	240	140	220	490	160	290	43	260	63	230	85	25000	25000	73821

Notes:

- (1) PAHs = polynuclear aromatic hydrocarbons.
- (2) Only compounds detected by analysis are reported in above table.
- (3) All values expressed in micrograms per kilogram (ug/kg).
- (4) nd = parameter not detected above the laboratory method detection limit.
- (5) PID = photoionization detector.
- (6) ppm = parts per million.
- (7) nm = not measured.

prepared by: KSG 4/97  
 checked by: EPK 4/97

Table 2

Groundwater Analytical Summary - PAHs  
 Site Investigation - CITGO East Chicago Terminal  
 East Chicago, Indiana

Well / Sample Name	Sampling Date	Naphthalene	Acenaphthylene	Fluorene	1-Methylnaphthalene	2-Methylnaphthalene	Total PAHs
Temporary Well Samples							
SB-1	12/3/96	nd	nd	nd	nd	nd	nd
SB-2	12/3/96	nd	nd	nd	nd	nd	nd
SB-3	12/3/96	nd	nd	nd	nd	nd	nd
SB-4	12/3/96	nd	nd	nd	nd	nd	nd
SB-5	12/3/96	8	3	nd	nd	nd	11
SB-6	12/3/96	300	55	6	170	350	881
SB-7	12/3/96	10	nd	nd	nd	2	12
SB-8	12/3/96	6	nd	nd	nd	nd	6
SB-9	12/3/96	nd	nd	nd	nd	nd	nd
SB-10	12/3/96	nd	nd	nd	nd	nd	nd
SB-11	12/4/96	6	nd	nd	nd	nd	6
SB-14	12/4/96	7	nd	nd	nd	nd	7
SB-15	12/4/96	280	78	6	160	380	904
SB-A*	12/4/96	150	nd	nd	330	100	580
SB-16	12/4/96	9	10	nd	nd	nd	19
SB-17	12/4/96	8	3	nd	nd	nd	11
Monitoring Well Samples							
MW-1	12/26/96	nd	nd	nd	nd	nd	nd
MW-2	12/26/96	nd	nd	nd	44	10	54
MW-3	12/26/96	nd	nd	nd	27	10	37
MW-A**	12/26/96	2	5	nd	2	14	23

## Notes:

- (1) PAHs = polynuclear aromatic hydrocarbons.
- (2) Only compounds detected by analysis are reported in above table.
- (3) All values expressed in micrograms per liter (ug/l).
- (4) nd = parameter not detected above laboratory detection limit.
- (4) \* = duplicate sample of SB-15.
- (5) \*\* = duplicate sample of MW-3.

Prepared by: KSG 4/97  
 Checked by: EPK 4/97

**Table 3****Groundwater Elevation and Well Construction Summary****Site Investigation****CITGO Petroleum Corporation****CITGO East Chicago Terminal****East Chicago, Indiana**

	MW-1	MW-2	MW-3
<b>Well Construction Detail</b>	<b>Monitoring Well Construction Summary</b>		
Ground Surface Elevation (feet)	95.53	95.70	95.89
Top of PVC Elevation (feet)	97.39	97.44	97.36
Top of Screen Elevation (feet)	94.53	94.70	94.88
Well Screen Length (feet)	10	10	10
Total Well Depth (feet)-bgs	11	11	11
<b>Measurement Date</b>	<b>Depth to Water (in feet below top of PVC)</b>		
December 26, 1996	3.73	3.82	3.57
<b>Measurement Date</b>	<b>Depth to Water (in feet below ground surface)</b>		
December 26, 1996	1.87	2.08	2.10
<b>Measurement Date</b>	<b>Water Level Elevation in feet</b>		
December 26, 1996	93.66	93.62	93.79
<b>Measurement Date</b>	<b>Water Level Above / Below (-) Top of Screen in feet</b>		
December 26, 1996	-0.87	-1.08	-1.09

prepared by: TEM 5/97

checked by: KMJ 9/97



**APPENDIX A**  
**SOIL BORING LOGS**

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-1	
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96
<b>Drilling Method</b> Geoprobe				<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL
<b>Common Well Name</b>				<b>Borehole Diameter</b> 1.5 inches	
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago	

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SBI-1			2	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			ND						
SBI-3			4											
SBI-5			6											
SBI-7			8											
SBI-9			10											
SBI-11			12											
			14	End of Boring at 12'										
			16											
			18											
			20											
			22											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.



<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-2			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane			<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b> Long	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W		
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PTD/FID	Soil Properties					RQD/ Comments	
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
SB2-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			24.2							
			2												
SB2-3			3								28.6				
			4												
SB2-5			5								32.5				
			6												
SB2-7			7					28.8							
			8	End of Boring at 8'											
			9												
			10												
			11												

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-3			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB3-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			ND						
			2											
SB3-3			3					ND						
			4											
			5					ND						
			6											
SB3-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-4			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> <b>State Plane</b>		<b>Feet N</b> <b>Feet E</b>	<b>Lat</b> <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB4-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP									
			2											
SB4-3			3											
			4											
SB4-5			5					ND						
			6											
SB4-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago					<b>Boring Number</b> SB-5		
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike					<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe
			<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches	
<b>Boring Location</b> State Plane			<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W		
<b>County</b> Lake County				<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago		

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RGD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB5-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			124						
			2											
SB5-3			3					135						
			4											
SB5-5			5					112						
			6											
SB5-7			7					115						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-6			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b> Long	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PTD/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB6-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			380						
			2											
SB6-3			3					410						
			4											
SB6-5			5					392						
			6											
SB6-7			7					354						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago					<b>Boring Number</b> SB-7						
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike					<b>Date Drilling Started</b> 12/03/96		<b>Date Drilling Completed</b> 12/03/96		<b>Drilling Method</b> Geoprobe		
			<b>Common Well Name</b>		<b>Final Static Water Level</b> Feet MSL		<b>Surface Elevation</b> Feet MSL		<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane					<b>Feet N</b>  <b>Feet E</b>		<b>Lat</b> Long		<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W		
<b>County</b> Lake County					<b>B2State</b> Indiana		<b>Civil Town/City/ or Village</b> East Chicago				

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB7-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			ND						
			2											
SB7-3			3					ND						
			4											
SB7-5			5					ND						
			6											
SB7-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-8			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB8-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			ND						
			2											
SB8-3			3					ND						
			4											
SB8-5			5					ND						
			6											
SB8-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-9			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB9-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP									
			2											
SB9-3			3											
			4											
SB9-5			5					ND						
			6											
SB9-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

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This form is based on the generic log form used in the State Wisconsin.



<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-10			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB10-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP									
			2											
SB10-3			3											
			4											
SB10-5			5					ND						
			6											
SB10-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

<b>Signature</b> Logged by Kevin S. Gill	<b>Firm</b> Natural Resource Technology
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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-11			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					ROD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB11-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP									
			2											
SB11-3			3											
			4											
SB11-5			5					ND						
			6											
SB11-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

<b>Signature</b> Logged by Kevin S. Gill	<b>Firm</b> Natural Resource Technology
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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-12			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB12-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			225						
			2											
SB12-3			3					452						
			4											
SB12-5			5					381						
			6											
SB12-7			7					276						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature Logged by Kevin S. Gill	Firm Natural Resource Technology
--------------------------------------	-------------------------------------

This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-13			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/03/96	<b>Date Drilling Completed</b> 12/03/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (If applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments	
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
SB13-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			320							
			2												
SB13-3			3					481							
			4												
SB13-5			5					427							
			6												
SB13-7			7					210							
			8	End of Boring at 8'											
			9												
			10												
			11												

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature Logged by Kevin S. Gill	Firm Natural Resource Technology
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This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-14			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/04/96	<b>Date Drilling Completed</b> 12/04/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB14-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			ND						
			2											
SB14-3			3					ND						
			4											
SB14-5			5					ND						
			6											
SB14-7			7					ND						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature Logged by Kevin S. Gill	Firm Natural Resource Technology
--------------------------------------	-------------------------------------

This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-15			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/04/96	<b>Date Drilling Completed</b> 12/04/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane			<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b> Long	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W		
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB15-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			284						
			2											
SB15-3			3					305						
			4	End of Boring at 4'										
			5											
			6											
			7											
			8											
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature Logged by Kevin S. Gill	Firm Natural Resource Technology
--------------------------------------	-------------------------------------

This form is based on the generic log form used in the State Wisconsin.

<b>Facility/Project Name</b> Citgo Petroleum - East Chicago				<b>Boring Number</b> SB-16			
<b>Boring Drilled By</b> (Firm name and name of crew chief) Terra Trace Mike				<b>Date Drilling Started</b> 12/04/96	<b>Date Drilling Completed</b> 12/04/96	<b>Drilling Method</b> Geoprobe	
		<b>Common Well Name</b>	<b>Final Static Water Level</b> Feet MSL	<b>Surface Elevation</b> Feet MSL	<b>Borehole Diameter</b> 1.5 inches		
<b>Boring Location</b> State Plane		<b>Feet N</b>  <b>Feet E</b>	<b>Lat</b>  <b>Long</b>	<b>Local Grid Location (if applicable)</b> <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W			
<b>County</b> Lake County			<b>B2State</b> Indiana	<b>Civil Town/City/ or Village</b> East Chicago			

Sample		Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
Number and Type	Length Alt. & Recovered (in)								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
SB16-1			1	SAND: Brown to gray, fine to medium grained sands with little coarse sand, little silt, wet at 1.5 feet.	SP			22.4						
			2											
SB16-3			3					18.2						
			4											
SB16-5			5					15.1						
			6											
SB16-7			7					17.8						
			8	End of Boring at 8'										
			9											
			10											
			11											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

<b>Signature</b> Logged by Kevin S. Gill	<b>Firm</b> Natural Resource Technology
---	--

This form is based on the generic log form used in the State Wisconsin.





## **APPENDIX C**

### **GROUNDWATER ANALYTICAL REPORTS**



WCH-041-1A  
ANALYST: J. L. B. J.  
TRAVELER CITY: W. J. B.  
DATE: 12/23/96  
PAGE: 1

Certificate of Analysis No. M1-9612181-01

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-1

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	111	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



ILLINOIS POLLUTION  
LABORATORY  
350 HUGHES DRIVE  
EAST ARLINGTON, ILL. 60005  
(815) 399-1400  
(815) 399-1401

Certificate of Analysis No. M1-9612181-02

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-2

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

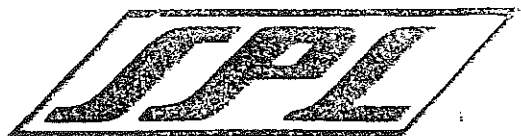
PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	67	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



CHICAGO, ILL.  
400 N. LAKE STREET, SUITE 1000  
CHICAGO, ILL. 60611  
(312) 462-1000

Certificate of Analysis No. M1-9612181-03

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-3

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) flucranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	102	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

DATE/TIME: 12/20/96 16:54:21  
DATE/TIME: 12/10/96 16:00:00

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



WILSON  
4401 CHIEF OF  
TRAVERSE CITY, MI 49601  
419/331-1111  
419/331-1112

Certificate of Analysis No. M1-9612181-04

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-4

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	91	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



W. H. GALLAGHER  
410 HUGHES DRIVE  
TRAVERSE CITY, MICHIGAN 49601  
(616) 932-1100

Certificate of Analysis No. M1-9612181-05

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: S3-5

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	8	1.8	µg/L
Acenaphthylene	3	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	87	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



1100 S. LA  
CHICAGO, IL 60605  
TRAVELER CTR. W. 10000  
1-800-SPRING-10  
1-800-555-1000

Certificate of Analysis No. M1-9612181-06

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-6

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	300	36	ug/L
Acenaphthylene	55	46	ug/L
Acenaphthene	ND	36	ug/L
Fluorene	6	4.2	ug/L
Phenanthrene	ND	12.8	ug/L
Anthracene	ND	13.2	ug/L
Fluoranthene	ND	4.2	ug/L
Pyrene	ND	5.4	ug/L
Chrysene	ND	3.0	ug/L
Benzo (a) anthracene	ND	0.26	ug/L
Benzo (b) fluoranthene	ND	0.36	ug/L
Benzo (k) fluoranthene	ND	0.34	ug/L
Benzo (a) pyrene	ND	0.46	ug/L
Dibenzo (a,h) anthracene	ND	0.6	ug/L
Benzo (g,h,i) perylene	ND	1.5	ug/L
Indeno (1,2,3-cd) pyrene	ND	0.86	ug/L
1-Methylnaphthalene	170	36	ug/L
2-Methylnaphthalene	350	36	ug/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 ug/L	58	50	120

ANALYZED BY: TGR DATE/TIME: 12/21/96 10:48:57  
EXTRACTED BY: VS DATE/TIME: 12/10/96 16:00:00  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS: HIGH TOTAL PETROLEUM HYDROCARBONS CAUSED ELEVATED  
DETECTION LIMITS.

QUALITY ASSURANCE: These analyses were performed in accordance with  
EPA Guidelines for analysis and quality control.



1100 SOUTH LEXINGTON  
400 HUGHES DRIVE  
TRAVERSE CITY, MI 49601  
(616) 941-1000  
FAX (616) 941-1001

Certificate of Analysis No. M1-9612181-07

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-7

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	10	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	2	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	64	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.





7100 N. LBS  
400 E. JOURNAL DRIVE  
TOLSON, ILL. 60001  
JPL  
JPL

Certificate of Analysis No. M1-9612181-08

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-8

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	6	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	92	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



10-10-1-100  
45. MICHAEL DRIVE  
TRAVERSE CITY, MI 49601  
888-SP-1110  
888-ATTN-6110

Certificate of Analysis No. M1-9612181-09

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-9

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS	
Naphthalene	ND	1.8	µg/L	
Acenaphthylene	ND	2.3	µg/L	
Acenaphthene	ND	1.8	µg/L	
Fluorene	ND	0.21	µg/L	
Phenanthrene	ND	0.64	µg/L	
Anthracene	ND	0.66	µg/L	
Fluoranthene	ND	0.21	µg/L	
Pyrene	ND	0.27	µg/L	
Chrysene	ND	0.15	µg/L	
Benzo (a) anthracene	ND	0.013	µg/L	
Benzo (b) fluoranthene	ND	0.018	µg/L	
Benzo (k) fluoranthene	ND	0.017	µg/L	
Benzo (a) pyrene	ND	0.023	µg/L	
Dibenzo (a,h) anthracene	ND	0.030	µg/L	
Benzo (g,h,i) perylene	ND	0.076	µg/L	
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L	
1-Methylnaphthalene	ND	1.8	µg/L	
2-Methylnaphthalene	ND	1.8	µg/L	

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	117	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



WILSON LAB  
408 HUGHES DRIVE  
TRAVERSE CITY, MI 49686  
(616) 937-1100  
(616) 937-1122

Certificate of Analysis No. M1-9612181-10

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE W  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-10

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/03/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	87	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



ILLINOIS POLLUTION LABORATORY  
CHICAGO, ILLINOIS 60605  
(312) 353-1234  
(312) 353-1235

Certificate of Analysis No. M1-9612181-13

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-11

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	6	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	102	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

DATE/TIME: 12/20/96 22:57:56  
DATE/TIME: 12/10/96 17:00:00

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



1700 N. LAKE  
450 N. LAKE DRIVE  
EAST CHICAGO, IL 60631  
(708) 441-1000  
FAX (708) 441-1001

Certificate of Analysis No. M1-9612181-14

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-14

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	7	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	101	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



WILSON  
F. HUGHES  
TRAVEL  
1995  
1996

Certificate of Analysis No. M1-9612181-17

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-15

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	280	36	µg/L
Acenaphthylene	78	46	µg/L
Acenaphthene	ND	36	µg/L
Fluorene	6	4.2	µg/L
Phenanthrene	ND	12.8	µg/L
Anthracene	ND	13.2	µg/L
Fluoranthene	ND	4.2	µg/L
Pyrene	ND	5.4	µg/L
Chrysene	ND	3.0	µg/L
Benzo (a) anthracene	ND	0.26	µg/L
Benzo (b) fluoranthene	ND	0.36	µg/L
Benzo (k) fluoranthene	ND	0.34	µg/L
Benzo (a) pyrene	ND	0.46	µg/L
Dibenzo (a,h) anthracene	ND	0.6	µg/L
Benzo (g,h,i) perylene	ND	1.52	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.86	µg/L
1-Methylnaphthalene	160	36	µg/L
2-Methylnaphthalene	380	36	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	70	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS: HIGH TOTAL PETROLEUM HYDROCARBONS CAUSED ELEVATED  
DETECTION LIMITS.

QUALITY ASSURANCE: These analyses were performed in accordance with  
EPA Guidelines for analysis and quality control.



1400 N. LAKE  
450 HUGHES DRIVE  
EAST ARLINGTON, IL 60005  
TEL: 847-266-5500  
FAX: 847-266-5501

Certificate of Analysis No. M1-9612181-18

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-16

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	9	1.8	µg/L
Acenaphthylene	10	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	84	50	120

ANALYZED BY: TGR DATE/TIME: 12/21/96 00:59:11  
EXTRACTED BY: VS DATE/TIME: 12/10/96 17:00:00  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



10000 LBS  
4000 LBS  
4000 LBS  
TRAFERSON W. 4000  
4000 LBS  
4000 LBS

Certificate of Analysis No. M1-9612181-19

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-17

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	8	1.8	µg/L
Acenaphthylene	3	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	63	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.





CHICAGO LAB  
450 N. MICHIGAN DRIVE  
CHICAGO, IL 60611  
(312) 567-1000

Certificate of Analysis No. M1-9612181-20

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE WC  
12/23/96

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: SB-A

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/04/96  
DATE RECEIVED: 12/10/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	150	36	µg/L
Acenaphthylene	ND	46	µg/L
Acenaphthene	ND	36	µg/L
Fluorene	ND	4.2	µg/L
Phenanthrene	ND	12.8	µg/L
Anthracene	ND	13.2	µg/L
Fluoranthene	ND	4.2	µg/L
Pyrene	ND	5.4	µg/L
Chrysene	ND	3.0	µg/L
Benzo (a) anthracene	ND	0.26	µg/L
Benzo (b) fluoranthene	ND	0.36	µg/L
Benzo (k) fluoranthene	ND	0.34	µg/L
Benzo (a) pyrene	ND	0.46	µg/L
Dibenzo (a,h) anthracene	ND	0.6	µg/L
Benzo (g,h,i) perylene	ND	1.52	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.86	µg/L
1-Methylnaphthalene	330	36	µg/L
2-Methylnaphthalene	100	36	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	56	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



CHICAGO, ILL  
1700 HUGHES DRIVE  
TRAPERSE CT. W. 49000  
CHICAGO, ILL 60640  
(312) 777-7700

Certificate of Analysis No. M1-9612567-01

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE GW  
01/14/97

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: MW-1

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/26/96  
DATE RECEIVED: 12/28/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	1.8	µg/L
Acenaphthylene	ND	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	ND	1.8	µg/L
2-Methylnaphthalene	ND	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	111	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



VIRGINIA L&E  
1111 HUGHES DRIVE  
FARMERS CITY, MO 64601  
(816) 335-1100  
(816) 335-1101

Certificate of Analysis No. M1-9612567-02

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE GV  
01/14/97

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: MW-2

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/26/96  
DATE RECEIVED: 12/28/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	9	µg/L
Acenaphthylene	ND	12	µg/L
Acenaphthene	ND	9	µg/L
Fluorene	ND	1.1	µg/L
Phenanthrene	ND	3.2	µg/L
Anthracene	ND	3.3	µg/L
Fluoranthene	ND	1.1	µg/L
Pyrene	ND	1.4	µg/L
Chrysene	ND	0.75	µg/L
Benzo (a) anthracene	ND	0.065	µg/L
Benzo (b) fluoranthene	ND	0.090	µg/L
Benzo (k) fluoranthene	ND	0.085	µg/L
Benzo (a) pyrene	ND	0.12	µg/L
Dibenzo (a,h) anthracene	ND	0.15	µg/L
Benzo (g,h,i) perylene	ND	0.38	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.22	µg/L
1-Methylnaphthalene	44	9	µg/L
2-Methylnaphthalene	10	9	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	60	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS: HIGH TOTAL PETROLEUM HYDROCARBONS CAUSED ELEVATED  
DETECTION LIMITS.

QUALITY ASSURANCE: These analyses were performed in accordance with  
EPA Guidelines for analysis and quality control.



1000 LUGER  
400 HUGHES DRIVE  
CHICAGO, IL 60688  
(312) 551-1000  
(312) 551-1001

Certificate of Analysis No. M1-9612567-03

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE GW  
01/14/97

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: MW-3

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/26/96  
DATE RECEIVED: 12/28/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	ND	9	µg/L
Acenaphthylene	ND	12	µg/L
Acenaphthene	ND	9	µg/L
Fluorene	ND	1.1	µg/L
Phenanthrene	ND	3.2	µg/L
Anthracene	ND	3.3	µg/L
Fluoranthene	ND	1.1	µg/L
Pyrene	ND	1.4	µg/L
Chrysene	ND	0.75	µg/L
Benzo (a) anthracene	ND	0.065	µg/L
Benzo (b) fluoranthene	ND	0.090	µg/L
Benzo (k) fluoranthene	ND	0.085	µg/L
Benzo (a) pyrene	ND	0.12	µg/L
Dibenzo (a,h) anthracene	ND	0.15	µg/L
Benzo (g,h,i) perylene	ND	0.38	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.22	µg/L
1-Methylnaphthalene	27	9	µg/L
2-Methylnaphthalene	10	9	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	107	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS: HIGH TOTAL PETROLEUM HYDROCARBONS CAUSED ELEVATED  
DETECTION LIMITS.

QUALITY ASSURANCE: These analyses were performed in accordance with  
EPA Guidelines for analysis and quality control.



1100 DAN LAR  
400 HUGHES DRIVE  
TRAVERSE CITY, MI 49601  
(616) 931-1100  
(616) 931-1101

Certificate of Analysis No. M1-9612567-04

CITGO PETROLEUM CORP.  
2316 Terminal Drive  
Arlington Hts., IL 60005  
ATTN: Scott Buckner

P.O.#  
2642, TYPE GW  
01/14/97

PROJECT: CITGO - E. CHICAGO  
SITE: E CHICAGO, IN  
SAMPLED BY: NATURAL RESOURCE TECHNOLOGY  
SAMPLE ID: MW-A

PROJECT NO: 1195  
MATRIX: WATER  
DATE SAMPLED: 12/26/96  
DATE RECEIVED: 12/28/96

ANALYTICAL DATA

PARAMETER	RESULTS	PQL*	UNITS
Naphthalene	2	1.8	µg/L
Acenaphthylene	5	2.3	µg/L
Acenaphthene	ND	1.8	µg/L
Fluorene	ND	0.21	µg/L
Phenanthrene	ND	0.64	µg/L
Anthracene	ND	0.66	µg/L
Fluoranthene	ND	0.21	µg/L
Pyrene	ND	0.27	µg/L
Chrysene	ND	0.15	µg/L
Benzo (a) anthracene	ND	0.013	µg/L
Benzo (b) fluoranthene	ND	0.018	µg/L
Benzo (k) fluoranthene	ND	0.017	µg/L
Benzo (a) pyrene	ND	0.023	µg/L
Dibenzo (a,h) anthracene	ND	0.030	µg/L
Benzo (g,h,i) perylene	ND	0.076	µg/L
Indeno (1,2,3-cd) pyrene	ND	0.043	µg/L
1-Methylnaphthalene	2	1.8	µg/L
2-Methylnaphthalene	14	1.8	µg/L

SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
p-Terphenyl-d14	10 µg/L	65	50	120

ANALYZED BY: TGR  
EXTRACTED BY: VS  
METHOD: 8310 Polynuclear Aromatic Hydrocarbons  
NOTES: \* - Practical Quantitation Limit ND - Not Detected  
NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses were performed in accordance with EPA Guidelines for analysis and quality control.



**APPENDIX D**

**WELL CONSTRUCTION DETAILS**



# **RECORD OF WATER WELL** State Form 35680 (R4 / 4-92)

MW-2

Mail complete record within 30 days to:  
INDIANA DEPARTMENT OF NATURAL RESOURCES  
Division of Water  
402 W. Washington St., Rm. W264  
Indianapolis, IN 46204  
(317) 232-4160

Fill in completely

WELL LOCATION				
County where drilled <b>LAKE</b>	Civil township	Township	Range	Section

Driving directions to the well location (include county road names, number, subdivision lot number with consideration to intersecting road and trip origination). There is space for a map on reverse side.

(see back side)

OWNER - CONTRACTOR	
Name of well owner <b>CITGO Petroleum Corporation</b>	Telephone number <b>(847) 437-3463</b>
Address (number and street, city, state, ZIP code) <b>2316 Terminal Drive, Arlington Heights, IL 60005</b>	
Name of building contractor	Telephone number

Address (number and street, city, state, ZIP code)	
Name of drilling contractor <b>Rock &amp; Soil Drilling Corporation</b>	Telephone number <b>(630) 377-7190</b>
Address (number and street, city, state, ZIP code) <b>1720 East Tyler Road, St. Charles, IL 60174</b>	
Name of equipment operator	License number
Date of completion	

CONSTRUCTION DETAILS		WELL LOG	
Use of well: <input type="checkbox"/> Home <input type="checkbox"/> Public supply <input type="checkbox"/> Industry <input type="checkbox"/> Stock <input checked="" type="checkbox"/> Test <input type="checkbox"/> Other (specify):	<input type="checkbox"/> Irrigation	FORMATIONS: Type of material	From (feet) To (feet)
Method of drilling: <input checked="" type="checkbox"/> Rotary <input type="checkbox"/> Cable tool <input type="checkbox"/> Jet <input type="checkbox"/> Rev. rotary <input type="checkbox"/> Bucket rig <input type="checkbox"/> Other		<b>SAND: fine to medium gr.</b>	<b>0 12</b>
Casing length <b>1</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches	
Screen length <b>10</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches	
Screen slot size <b>.010</b>	Total depth of well <b>11 feet</b>		
Depth of pump setting <b>N/A</b>	Water quality (clear, cloudy, odor, etc.)		
Type of pump: <input type="checkbox"/> Submersible <input type="checkbox"/> Shallow-well jet <input type="checkbox"/> Deep-well jet <input checked="" type="checkbox"/> Other (specify): <b>N/A</b>			
WELL CAPACITY TEST			
Check one: <input type="checkbox"/> Bailing <input checked="" type="checkbox"/> Air <input checked="" type="checkbox"/> Pumping	Test rate: <b>3</b> gpm <b>1/4</b> hrs.		
Drawdown <b>~ 2</b> feet	Static level <b>depth of water ~ 1.5</b> feet		
GROUTING INFORMATION		WELL ABANDONMENT	
Grout material <b>bentonite</b>	Depth of grout From <b>0</b> to <b>1</b>	Sealing material	Depth filled From To
Method of installation <b>gravity</b>	Number of bags used <b>two</b>	Method of installation	Number of bags used

I hereby swear or affirm, under the penalties for perjury that the information submitted herewith is to the best of my knowledge and belief, true, accurate and complete.

Signature of owner or authorized representative

T Mueller

Date

9-9-97

(Additional space for well log on reverse side)



**RECORD OF WATER WELL**  
State Form 35680 (R4 / 4-92)

MW-3

Mail complete record within 30 days to:  
INDIANA DEPARTMENT OF NATURAL RESOURCES  
Division of Water  
402 W. Washington St., Rm. W264  
Indianapolis, IN 46204  
(317) 232-4160

Fill in completely

WELL LOCATION				
County where drilled <b>LAKE</b>	Civil township	Township	Range	Section

Driving directions to the well location (include county road names, number, subdivision lot number with consideration to intersecting road and trip origination). There is space for a map on reverse side.

(see back side)

OWNER - CONTRACTOR	
Name of well owner <b>CITGO Petroleum Corporation</b>	Telephone number <b>(947) 437-3463</b>
Address (number and street, city, state, ZIP code) <b>2316 Terminal Drive, Arlington Heights, IL 60005</b>	
Name of building contractor	Telephone number
Address (number and street, city, state, ZIP code)	

Name of drilling contractor <b>Rock &amp; Soil Drilling Corporation</b>	Telephone number <b>(630) 377-7190</b>
Address (number and street, city, state, ZIP code) <b>1720 East Tyler Road, St. Charles, IL 60174</b>	
Name of permit operator	License number
Date of completion	

CONSTRUCTION DETAILS		WELL LOG		
Use of well: <input type="checkbox"/> Home <input type="checkbox"/> Public supply <input type="checkbox"/> Industry <input type="checkbox"/> Stock <input checked="" type="checkbox"/> Test <input type="checkbox"/> Other (specify): <input type="checkbox"/> Irrigation	Method of drilling: <input checked="" type="checkbox"/> Rotary <input type="checkbox"/> Cable tool <input type="checkbox"/> Jet <input type="checkbox"/> Rev. rotary <input type="checkbox"/> Bucketing <input type="checkbox"/> Other	FORMATIONS: Type of material <b>SAND: fine to medium gr.</b>	From (feet) <b>0</b>	To (feet) <b>12</b>
casing length <b>1</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches		
Screen length <b>10</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches		
Screen slot size <b>.010</b>	Total depth of well <b>11 feet</b>			
Depth of pump setting <b>N/A</b>	Water quality (clear, cloudy, odor, etc.)			
Type of pump <input type="checkbox"/> Submersible <input type="checkbox"/> Shallow-well jet <input type="checkbox"/> Deep-well jet <b>N/A</b>	Other (specify):			
WELL CAPACITY TEST				
Check one <input type="checkbox"/> Bailing <input checked="" type="checkbox"/> Air Pumping	Test rate <b>3</b> gpm <b>1/4</b> hrs.			
Drawdown <b>~ 2</b> feet	Static level <b>depth of water ~ 1.5</b> feet			
GROUTING INFORMATION		WELL ABANDONMENT		
Grout material <b> Bentonite</b>	Depth of grout From <b>0</b> to <b>1</b>	Sealing material	Depth filled From To	
Method of installation <b>gravity</b>	Number of bags used <b>two</b>	Method of installation	Number of bags used	

I hereby swear or affirm, under the penalties of perjury that the information submitted herewith is to the best of my knowledge and belief, true, accurate and complete.

Signature of owner or authorized representative

*T Mueller*

Date

**9-9-97**





# RECORD OF WATER WELL

State Form 35680 (R4 / 4-92)

MW-1

Mail complete record within 30 days to:  
INDIANA DEPARTMENT OF NATURAL RESOURCES  
Division of Water  
402 W. Washington St., Rm. W264  
Indianapolis, IN 46204  
(317) 232-4160

Fill in completely

WELL LOCATION				
County where drilled <b>LAKE</b>	Civil township	Township	Range	Section
Driving directions to the well location (include county road names, number, subdivision lot number with consideration to intersecting road and trip origination). There is space for a map on reverse side. <b>(see back side)</b>				
OWNER - CONTRACTOR				
Name of well owner <b>CITGO Petroleum Corporation</b>			Telephone number <b>(847) 437-3463</b>	
Address (number and street, city, state, ZIP code) <b>2316 Terminal Drive, Arlington Heights, IL 60005</b>				
Name of building contractor			Telephone number	
Address (number and street, city, state, ZIP code)				
Name of drilling contractor <b>Rock &amp; Soil Drilling Corporation</b>			Telephone number <b>(630) 377-7190</b>	
Address (number and street, city, state, ZIP code) <b>1720 East Tyler Road, St. Charles, IL 60174</b>				
Name of equipment operator			License number	Date of completion
CONSTRUCTION DETAILS			WELL LOG	
Use of well: <input type="checkbox"/> Home <input type="checkbox"/> Industry <input checked="" type="checkbox"/> Test <input type="checkbox"/> Irrigation <input type="checkbox"/> Public supply <input type="checkbox"/> Stock <input type="checkbox"/> Other (specify):			FORMATIONS: Type of material	
Method of drilling: <input checked="" type="checkbox"/> Rotary <input type="checkbox"/> Jet <input type="checkbox"/> Bucket rig <input type="checkbox"/> Cable tool <input type="checkbox"/> Rev. rotary <input type="checkbox"/> Other			From (feet) To (feet)	
			<b>SAND: fine to medium gr. 0 12</b>	
Casing length <b>1</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches		
Casing length <b>10</b> feet	Material <b>PVC (schedule 40)</b>	Diameter <b>4</b> inches		
Screen slot size <b>.010</b>	Total depth of well <b>11 feet</b>			
Depth of pump setting <b>N/A</b>	Water quality (clear, cloudy, odor, etc.)			
Type of pump <input type="checkbox"/> Submersible <input type="checkbox"/> Shallow-well jet <input type="checkbox"/> Other (specify): <b>N/A</b>				
WELL CAPACITY TEST				
Check one <input type="checkbox"/> Bailing <input checked="" type="checkbox"/> Air <input checked="" type="checkbox"/> Pumping	Test rate <b>3</b> gpm <b>1/4</b> hrs.			
Drawdown <b>~ 2</b> feet		Static level (depth of water) <b>~ 1.5</b> feet		
GROUTING INFORMATION		WELL ABANDONMENT		
Grout material <b>bentonite</b>	Depth of grout From <b>0</b> to <b>1</b>	Sealing material	Depth filled From To	
Method of installation <b>gravity</b>	Number of bags used <b>two</b>	Method of installation	Number of bags used	
(Additional space for well log on reverse side)				
I hereby swear or affirm, under the penalties for perjury that the information submitted herewith is to the best of my knowledge and belief, true, accurate and complete.			Signature of owner or authorized representative <b>T Mueller</b> Date <b>9-9-97</b>	

**APPENDIX E**  
**SLUG TEST RESULTS**

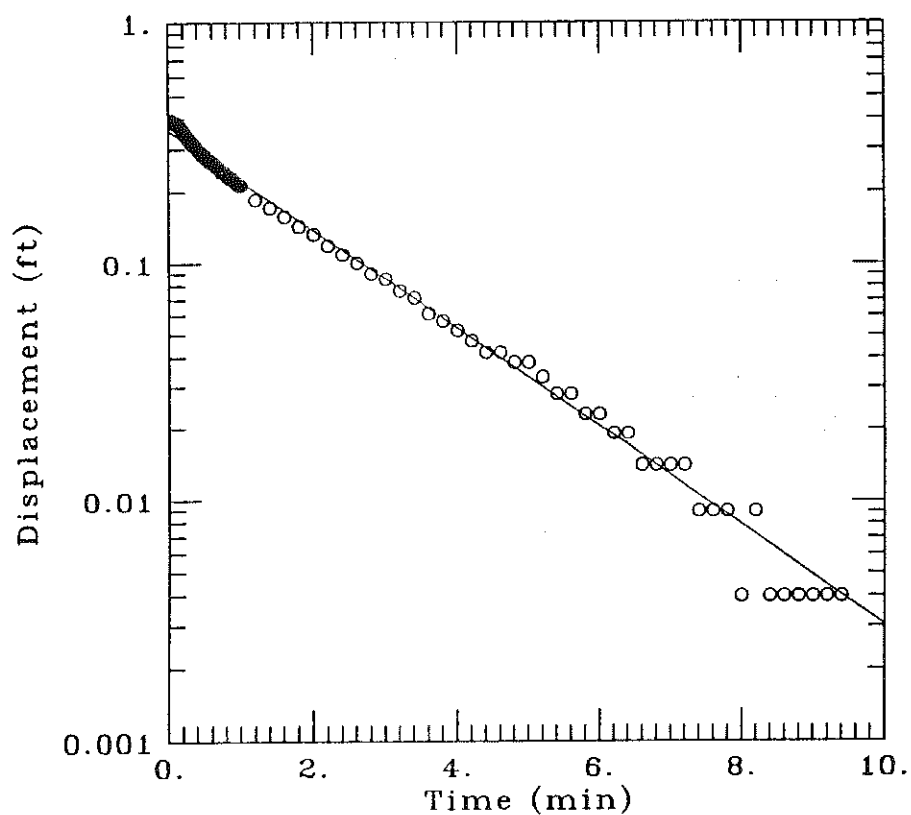
Natural Resource Technology

Client: Citgo East Chicago Terminal

Project No.: 1195

Location: East Chicago, IN

### MW-1



DATA SET:

mw1.dat

02/26/97

AQUIFER TYPE:

Unconfined

SOLUTION METHOD:

Bouwer-Rice

TEST WELL:

MW-1

OBS. WELL:

MW-1

ESTIMATED PARAMETERS:

$K = 0.00153$  ft/min

$y_0 = 0.3579$  ft

TEST DATA:

$H_0 = 0.395$  ft

$r_c = 0.17$  ft

$r_w = 0.42$  ft

$L = 10.$  ft

$b = 10.$  ft

$H = 9.5$  ft

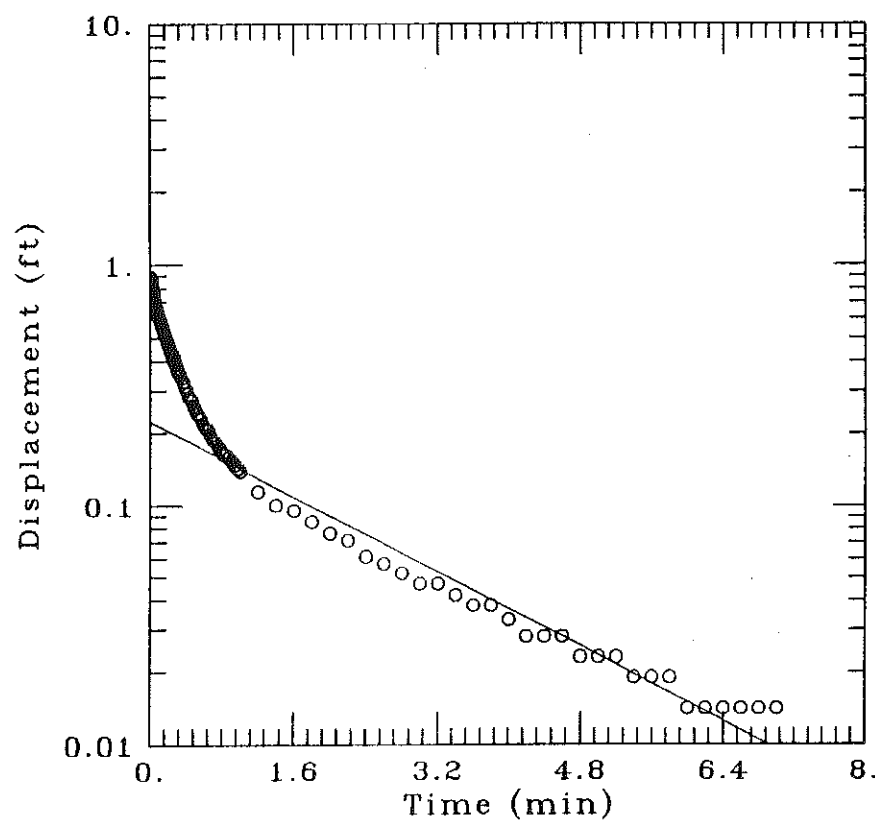
Natural Resource Technology

Client: Citgo East Chicago Terminal

Project No.: 1195

Location: East Chicago, IN

## MW-2



### DATA SET:

mw2.dat

02/26/97

### AQUIFER TYPE:

Unconfined

### SOLUTION METHOD:

Bouwer-Rice

### TEST WELL:

MW-2

### OBS. WELL:

MW-2

### ESTIMATED PARAMETERS:

$K = 0.001444$  ft/min

$y_0 = 0.2225$  ft

### TEST DATA:

$H_0 = 0.891$  ft

$r_c = 0.17$  ft

$r_w = 0.42$  ft

$L = 10.$  ft

$b = 10.$  ft

$H = 9.5$  ft

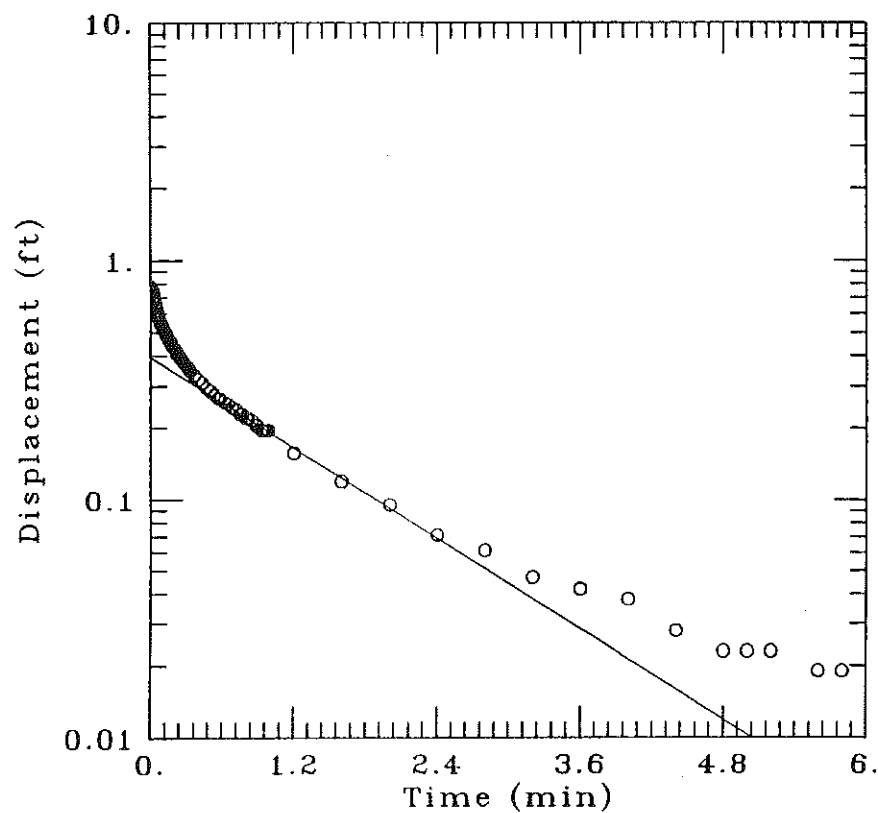
Natural Resource Technology

Client: Citgo East Chicago Terminal

Project No.: 1195

Location: East Chicago, IN

### MW-3



DATA SET:

mw3.dat

02/26/97

AQUIFER TYPE:

Unconfined

SOLUTION METHOD:

Bouwer-Rice

TEST WELL:

MW-3

OBS. WELL:

MW-3

ESTIMATED PARAMETERS:

$K = 0.002341$  ft/min

$y_0 = 0.3958$  ft

TEST DATA:

$H_0 = 0.776$  ft

$r_c = 0.17$  ft

$r_w = 0.42$  ft

$L = 10.$  ft

$b = 10.$  ft

$H = 9.5$  ft



## **APPENDIX F**

### **HYDRAULIC GRADIENT AND GROUNDWATER VELOCITY CALCULATIONS**

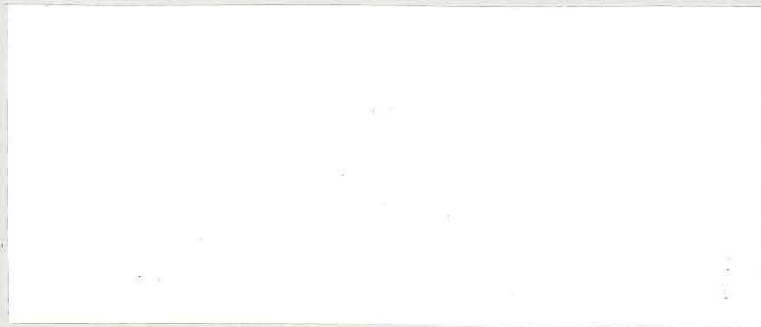


CITGO E. Chicago (N)

I-1

6-3-83

**WESTON • SPER**



**Roy F. Weston, Inc.**  
**Spill Prevention & Emergency Response Division**

In Association with Jacobs Engineering Group Inc., Tetra Tech, Inc.  
and ICF Incorporated



SITE INVESTIGATION AND STATUS REPORT  
ASBESTOS CONTAMINATION  
CITGO FACILITY  
EAST CHICAGO, INDIANA

ROY F. WESTON  
TECHNICAL ASSISTANCE TEAM  
Region V

Prepared by  
Kevin M. Pierard

3 June 1983

TDD NO. 5-8305-10  
PCS NO. 1106

## INTRODUCTION

On 18 May 1983 TAT was tasked to perform an inspection and review background information on the East Chicago/CITGO property. TAT member Kevin Pierard made the inspection on 26 May with OSC Pankanin. The CITGO facility is located in East Chicago, Indiana, on approximately 320 acres (Figure 1). The area of concern is an 80 acre site consisting of a partially dismantled, abandoned oil refinery.

## HISTORY

CITGO began operations at the facility in the late 1920s; the refinery portion was shut down in 1972 and partially dismantled between 1976 and 1980 by Lloyd Hodges. This activity exposed asbestos-covered debris and released large quantities of free asbestos. On 20 August 1980, the USEPA filed a complaint under RCRA, regarding the asbestos problem, against Hodges and CITGO. After this, Hodges removed two piles (approximately 200 yd<sup>3</sup>) of asbestos-laden material, then declared bankruptcy. There have been no subsequent cleanup activities at the site.

## SAMPLING

Sampling at the site was completed on 21 September 1982 by the EPA. A total of 17 samples were taken, 15 of which contained between 3% and 22% asbestos (Attachment 1). None of the samples were taken where fibrous materials were not obvious.

## SIZE HAZARDS

Due to the shape and small size of asbestos fibers, they may easily become airborne and remain so for long periods of time. There has been extensive documentation of the ability of airborne asbestos to cause cancer and lung damage through inhalation.

OSHA limits for employee asbestos exposure over an 8-hour period is 2 fibers, longer than 5 micrometers, per cubic centimeter of air. OSHA regulations set a ceiling concentration (one time exposure) limit at 10 fibers, longer than 5 micrometers, per cubic centimeter of air. The population within a one kilometer radius of the site is approximately 460, within 5 kilometers the population is 80,000.

## EPA RECOMMENDATIONS

The most recent remedial response program (14 April 1983) submitted by Jim Pankanin of Remedial Response to Frank Biros of the office of Waste Programs Enforcement (OWPE) for review includes:

I. The demolition of all standing structures on the asbestos waste site that are covered with asbestos insulation materials, in accordance with applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations, 40 CFR Part 61, Subpart B, and specific requirements set forth below. In particular, care should be taken to adequately wet the material during the entire demolition period and not to work during high winds. Asbestos materials shall not be dropped or thrown to the ground. The removed material should be properly bagged, labeled and disposed of at a state-licensed landfill. Vehicles leaving the site should be washed before leaving. Onsite traffic patterns for the demolition equipment shall be developed and approved by EPA in advance to avoid movement of the vehicles or equipment over asbestos material already on the ground.

II. Visible deposits of asbestos insulation materials are currently scattered throughout the site. The program requires that all visible deposits of asbestos insulation materials and the associated contaminated soils be wetted, scraped up, bagged, labeled and properly disposed of at a state-licensed landfill. All dismantled piping which is coated with deteriorated asbestos insulation materials should be wetted and hauled to a central onsite location to be completely stripped of the asbestos material. The removed material should be properly bagged, labeled and disposed of at a state-licensed landfill. Salvageable piping should not be disposed with the asbestos wastes. None of these asbestos handling operations shall be conducted under windy conditions.

A plan for onsite traffic patterns shall be reviewed and approved by EPA prior to undertaking the asbestos cleanup activities. The purpose of the plan shall be to avoid disruption and migration of the asbestos materials from contaminated areas to areas of the site that have been cleaned of asbestos materials. EPA and its contractors shall be allowed access to the site during working hours in order to inspect all ongoing cleanup operations and to ensure that each area of the site is appropriately cleaned of asbestos insulation materials before installation of any cover material to that area.

III. After completion of the cleanup required in Section II and inspection by EPA or its contractors, each area of the asbestos waste site shall be covered with an appropriate compacted cover material at least six (6) inches deep. Covering and compaction operations shall be done over small plots in order to minimize site disruption. Each area should be wetted before covering to minimize dust production. At least six (6) inches of additional top soil shall then be applied to each area. The topsoil should be seeded and revegetated as soon as possible to prevent erosion by wind or rain.

Any areas left uncovered shall be sampled to ensure that no analytically detectable asbestos material exists in those areas. All analytical work

shall be performed utilizing polarizing light microscopy with a detectable limit of one percent (1%) asbestos in soils. A sampling protocol shall be developed and submitted to EPA which utilizes a grid system to statistically determine that no analytically detectable asbestos material remains in those areas.

IV. A notation shall be recorded on the deed to the site, or such other instrument which is normally examined in a title search, that will notify any potential purchaser of the property that the land has been contaminated with hazardous asbestos waste materials, and that any use of the site must not disturb the integrity of the final cover unless the Regional Administrator of U.S. EPA determines that adequate safety precautions will be implemented and that said disturbance will not increase the potential hazard to human health or the environment.

V. The following measures shall be taken, commencing immediately, and lasting for the duration of the remedial response program:

A. A penetrating sealant shall be applied to all exposed asbestos insulation remaining on the buildings and tanks, and the material on the ground shall be kept continuously wet. A spray system shall be installed to accomplish this end.

B. Access to the asbestos waste site shall be restricted to authorized persons only, by fencing or other means.

Notices shall be posted at all entry points warning that the site contains asbestos materials.

C. Persons entering the site shall be forewarned that the area contains asbestos materials, and such persons shall be advised in and given access to, the use of protective clothing, respirators and cleaning of all equipment used in the area.

D. All personnel, vehicles, machinery and equipment shall be decontaminated upon leaving the site.

VI. Continuous air monitoring must be performed both upwind and downwind around the perimeter of the active work site(s) whenever removal operations are underway. At least one sample from each air monitor shall be analyzed daily in accordance with OSHA-specified analytical procedures. Operations shall be curtailed whenever the air monitoring indicates asbestos levels above the following threshold limit values (TLV):

Amosite	0.5 fibers > 5 microns/cc
Chrysotile	2.0 fibers > 5 microns/cc
Crocidolite	0.2 fibers > 5 microns/cc
Other forms	2.0 fibers > 5 microns/cc

EPA shall be notified whenever these limits are exceeded. Operations shall not be restored until the source of the asbestos is investigated and the site is more completely wetted down.

- VII. Actions described herein shall be performed in accordance with a detailed scope of work plan that must be approved by EPA. Notices shall be given to EPA prior to undertaking actions described in paragraphs I, II, or III above, and EPA or its contractors shall be permitted access to the site to oversee such actions and to split samples if requested.

This program has not been approved by the OWPE nor has it been given to CITGO.

#### CLEANUP COST ESTIMATE

The costs associated with the remedial response program are outlined below. Costs were obtained from correspondence dated 12 May 1983, from Pankanin to Neuberger of Regional Counsel. These costs do not include costs for demolition of existing structures.

##### A. Disposal of asbestos materials scattered throughout site:

1. Collect coated piping; wet and strip	
(4 man crew) (\$17/hr) (8 hr/day) (10 days)	= \$ 5,440
(1 forklift + 1 truck) (\$200/day) (10 days)	= 2,000
2. Manual cleanup of wetted asbestos throughout site	
(8 man crew) (\$17/hr) (8 hr/day) (10 days)	= 10,880
(1 truck) (\$100/day) (10 days)	= 1,000
3. Rent 20 sludge box -1 2 yd <sup>3</sup> rolls	
(20) (\$150/day) (10 days)	= 30,000
4. Transportation and disposal	
(20 loads) (\$50/load)	= 1,000
12 yd-3 load) (20 loads) (\$17/yd <sup>3</sup> )	= 4,080
	<u>\$54,400</u>

##### B. Covering site with compacted cover material) (6" thickness)

$$\begin{aligned} & 80 \text{ acres} \times 43,560 \frac{\text{ft}^2}{\text{acre}} \times 0.5 \text{ ft} \frac{(1 \text{ yd}^3)}{(27 \text{ ft})} \\ &= 64,533 \text{ yd}^3 \\ &64,533 \text{ yd}^3 \text{ clay} \times \$3.00/\text{yd}^3 = \$193,600 \end{aligned}$$

Deliver clay in 16 yd<sup>3</sup> loads = \$201,650.00  
(\$50.00/load - 4,033 loads)

60 loads/day - 67 days - 14 weeks

Grade and compact soil during final eight (8)  
weeks using grader and bulldozer (to work in corners)

Grader - 40 days x \$40.00/hr x 8 hrs/day = \$ 12,800.00  
D6 (Dozer) - 40 days x \$45.00/hr x 8 hr/day = 14,400.00  
\$422,450.00

C. Cover site with top soil and vegetate

1. A variety of cover materials can be used as long as it will support vegetation. Sandy loam materials can be combined with fly ash or slag.

Assume costs are lower than clay = \$400,000.00  
Vegetation = 900.00  
\$400,900.00

D. Personnel

2 heavy equipment operators  
(\$28/hr) (8 hrs/day) (60 days) (2) = \$ 26,880.00  
Project supervisor  
(\$35/hr) (8 hr/day) (60 days) = 16,800.00  
Technician  
(\$17/hr) (8 hr/day) (60 days) = 8,160.00  
Safety equipment and monitoring  
(\$30/man) (4 men) (60 days) = 7,200.00  
\$ 59,040.00

TOTAL \$935,890.00

CONCLUSIONS AND RECOMMENDATIONS

The company has recently shown an interest in resolving the asbestos problem and has in fact submitted a plan to the EPA for demolition of existing structures and disposal of waste containing asbestos. The company stated (at the 26 May inspection) that they hoped to begin this portion of the cleanup on 15 June and complete it before 1 December. The plan is being reviewed by the EPA to assure compliance under NESHAP regulations (40 CFR, Part 61 subparts A and B).

We feel that the actions being taken are in the best interests of all parties concerned. We do not believe the site represents an emergency at this time if the structures present on site are demolished and removed in compliance with all applicable NESHAP regulations.

Covering of the site may be limited to small areas if the company handles asbestos materials carefully and removes soils which are obviously contaminated.

After this is completed, a comprehensive soil sampling program should be initiated to determine if soils in any other areas actually need to be removed or covered.

FIGURE 1



Citgo Facility Limit

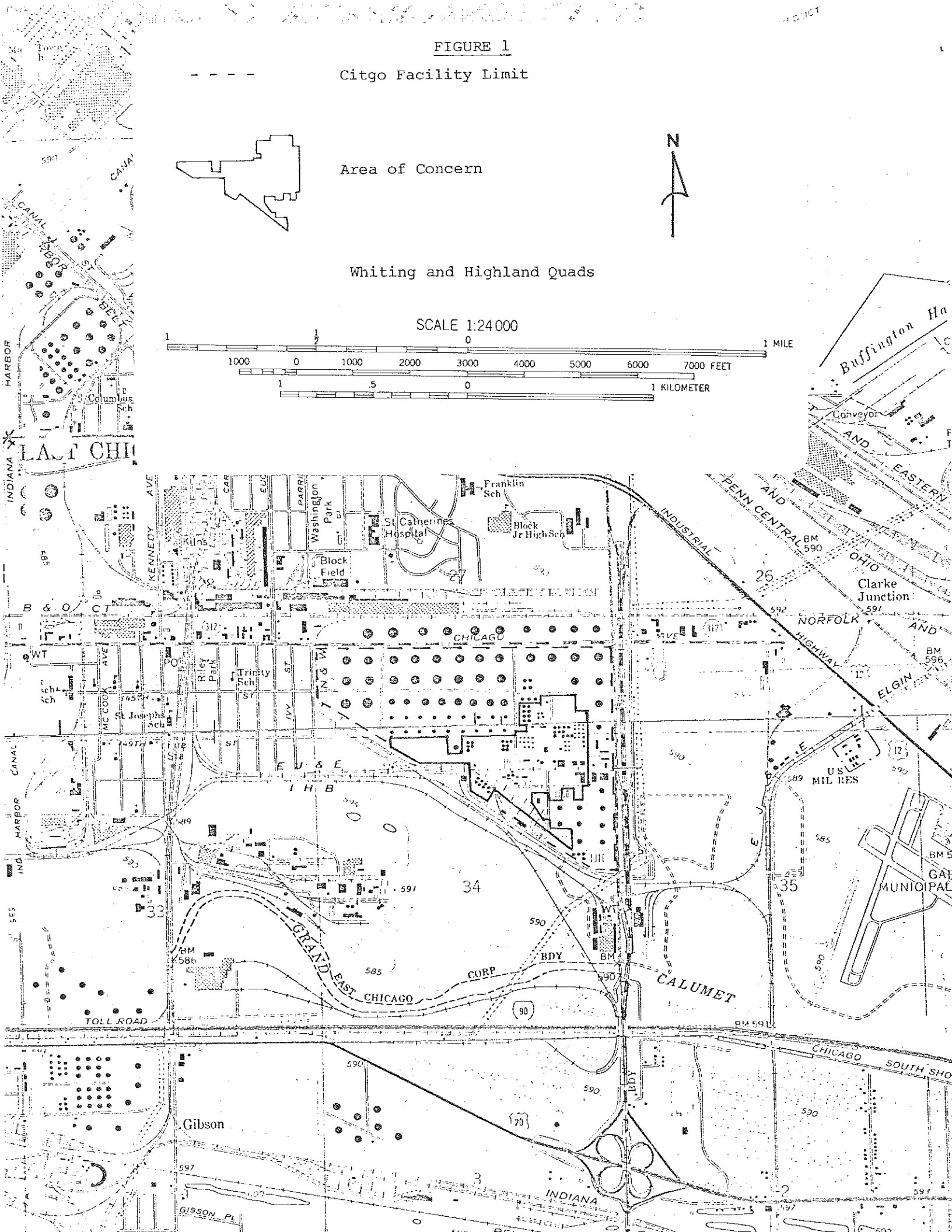
Whiting and Highland Quads

SCALE 1:24,000

1 MILE

7000 FEET

1 KILOMETER



ATTACHMENT 1

CITIES SERVICE COMPANY, EAST CHICAGO, INDIANA  
ASBESTOS SAMPLING AND INSPECTION

PICTURE NUMBER	TIME 9/21/82	SAMPLE NO. CG05	% ASBESTOS	ESTIMATED CUBIC FEET OF ASBESTOS	PICTURE LOCATION AND REMARKS	SAMPLE LOCATION
1	10:05 a.m.	S01	4	--	Debris near Alkalation Unit; facing West	Insulation debris on ground
2	10:06 a.m.	S02	6	--	Alkalation Unit tower; facing West	Inside of bottom of pipes sticking down
3	10:18 a.m.	S03	8	4.4	2 tanks 30' x 7' with 1/2" insulation West of Tank 59; facing West	Degraded insulation between tanks
4	10:25 a.m.	S04	7	--	Crude unit area; facing East	Upper surface of ground
5	10:37 a.m.	S05	None	--	Tank 196 & 197; facing North	Degrading insulation from side of tank
6	10:48 a.m.	S06	16	7.9	MGL battery coker piping; facing Northeast	Degrading insulation from pipe
7	10:52 a.m.	S07	3	1.1	MGL battery, asbestos paper <1/2" paper <1/2"	Degraded insulation from ground near MGL piping
8	11:00 a.m.	S08	22	--	Soil sample, 150' N.E. tank 15; facing North	Upper surface of ground
9	11:20 a.m.	S09	14	--	Bottom catalytic cracker; facing West	Degrading insulation from pipe sticking down
10	11:25 a.m.	S10	4	--	Insulation pile N.E. cracking tower; facing West	Pile of degraded insulation
11	11:30 a.m.	S11	4	--	Pump & compressor house	Degrading insulation from pipe
12	11:38 a.m.	---	--	--	Bagged Asbestos	
13	11:42 a.m.	S12	11	--	Treating plant; facing East	Degrading insulation from bottom of pipe along tower
14	1:18 p.m.	---	--	--	Delay cooling unit, inside building	
15	1:20 p.m.	---	--	--	Weathered insulation	
16	1:30 p.m.	---	--	--	Catalytic cracker in background Painting tanks in foreground; facing E.	
17	1:37 p.m.	S13	6	0.74	80', 6" pipe, 1" insulation; WSN Tank 44; facing Northwest	Degrading insulation from pipe
18	1:40 p.m.	---	--	--	Weathered insulation	
19	1:45 p.m.	S14	5	0.75	Weathered insulation 3'x6'x0.5; facing North	Pile of degraded insulation
20	2:00 p.m.	S15	21	30.2	Desalter accumulator 50'x10'D, 1" insulation; facing Northwest	Degrading insulation from tank
21	2:13 p.m.	S16	<1	--	Fibered soil surface, SSW tank 80	
22	2:30 p.m.	S17	6	6.8	Tank 9'x19.6', 2" insulation; 200' SSW Tank 80; facing South	Degraded insulation from near tank



SAFETY PLAN

Region V  
Date 5-26-83  
TDD# 5-8305-10

SAFETY PLANA. Incident Description

1. Location Citgo P.O. Box 178 2500 East Chicago Ave. East Chicago, In. 46312
2. Date 5-26-83
3. Type: Spill ☐ Fire ☐ HW Site ☐ Other Asbestos Site
4. Status Old Refinery
5. Response Objectives Determine if an emergency situation exists.
6. Background Review: Complete ☒ Partial ☐  
If partial, why? \_\_\_\_\_
7. Hazard Level: High ☐ Moderate ☒ Low ☐ Unknown ☐  
Inhalation ☒ Ingestion ☐ Contact ☐ External ☐
8. Site Plan/Sketch Attached Yes ☐ No ☒
9. Background Material attached Yes ☐ No ☒

B. Material Description

1. Type: Liquid ☐ Solid ☒ Sludge ☐ Vapor/Gas ☐
2. Chemical Name/Class Asbestos (Amosite, Amphibole)
3. Characteristics: Corrosive ☐ Ignitable ☐ Volatile ☐  
Toxic ☒ Reactive ☐ Biological Agent ☐
4. Toxicity: TLV \_\_\_\_\_ IDLH \_\_\_\_\_
5. Special Hazards \_\_\_\_\_
6. Acute Exposure Symptoms Shortness of breath of gradually increasing intensity and a dry cough.

SMG:ss  
11/24/82

C. Site Description

1. Size 80 acres
2. Surrounding Population 460 within one Km.
3. Buildings/Homes \_\_\_\_\_
4. Topography Relatively flat
5. Receiving Waters Lake Michigan 1½ miles North
6. Weather 60° sunny
7. Unusual Features \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. Site History Site opened in the 1920's, refinery area closed  
in 1972 partially torn down between 1976 and 1980 releasing large  
quantities of asbestos.

D. Personnel Protection

1. Entry Level of Protective clothing : A ☐ B ☐ C ☒ D ☐
2. If not B, why? Contaminant did not warrant level B.  
\_\_\_\_\_
3. Site Instrument Readings:  

% O2 _____	% LEL _____
Radioactivity _____	HNU _____
OVA _____	Other _____
4. Was protective level up or downgraded: Yes ☐ No ☒  
Up or Down graded to: A ☐ B ☐ C ☐ D ☐  
Why \_\_\_\_\_  
\_\_\_\_\_  
Actual Change: \_\_\_\_\_  
\_\_\_\_\_
5. Respirator Protective Equipment:  

SCBA _____	Canister Type _____
Gas Mask <u>x</u>	Cartridge Type <u>GMD-H Combination</u>
Ultra Twin <u>x</u>	
Dust Mask _____	
6. Protective Clothing:  

<u>Boot covers</u>	<u>Nitrile gloves</u>	_____
<u>Steel Toe Boots,</u>	<u>Hard Hats</u>	_____
<u>Tyvek suit</u>	<u>Ultra Twin</u>	_____

7. Field Monitoring Equipment and Materials:

None		

E. Decontamination Procedures

Remove disposable clothing, put clothing in plastic bag and dispose of on site.

1. Attach sketch showing Exclusion Zone, Contamination Reduction Zone, Support Zone and numerically labelled Decontamination Stations.
2. For each decontamination station note procedure and materials needed on an attachment page.

F. General Information

1. Team members

Kevin Pierard	

2. Site Safety Coordinator Kevin Pierard

G. Emergency Information

1. Have nearby people been evacuated: Yes ☒ No ☒ ~~xxx~~  
If yes ever how large an area \_\_\_\_\_

2. First Aid Instructions Remove disabled person to uncontaminated area and treat ailment.  
\_\_\_\_\_  
\_\_\_\_\_

3. Sources of help

	Name	Town	Phone	Notified Yes No
Fire				
Police		East Chicago	392-8307	No
Ambulance		East Chicago	392 8420	No
Hospital				
Poison Information				
Airport				
Heliport				
Site Telephone	Citgo	East Chicago	398-0734	
Nearest Telephone	Citgo	East Chicago	398-0734	



4. Emergency Telephone Numbers

WESTON Hot Line	215-524-1925 or 1926
WESTON NPD	215-431-0797 or 0798 or 692-3030
P. B. Lederman - NPM	201-665-0359 (Home)
S. M. Gertz - HSO	215-667-5461 (Home)
Medical Emergency	513-421-3063 (National Service)
EPA - ERT Emergency	201-321-6660
Chemtrec	800-424-9300
Central Disease Control	404-329-3311 (day) 404-329-3644 (night)
National Pesticide	800-845-7633
Medical Emergency	(Regional Service)

Prepared by

Date

Approved by

Date

(For HSO Use Only)

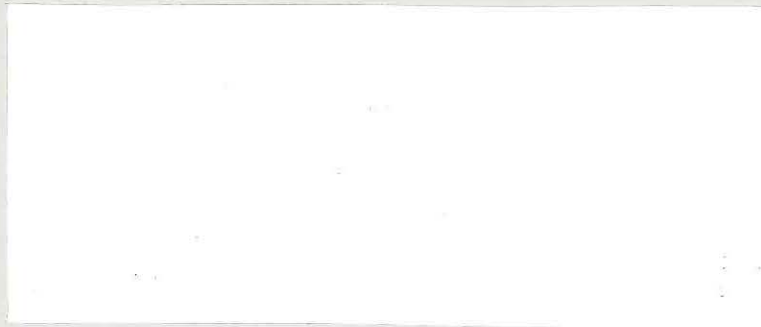
Reviewed and Comments \_\_\_\_\_

Action Required? Yes ☒ No ☒ If yes, what action \_\_\_\_\_

Followup carried out? Date \_\_\_\_\_

S. O. Signature \_\_\_\_\_

Date \_\_\_\_\_



**Roy F. Weston, Inc.**  
**Spill Prevention & Emergency Response Division**

In Association with Jacobs Engineering Group Inc., Tetra Tech, Inc.  
and ICF Incorporated

SITE INVESTIGATION AND STATUS REPORT  
ASBESTOS CONTAMINATION  
CITGO FACILITY  
EAST CHICAGO, INDIANA

ROY F. WESTON  
TECHNICAL ASSISTANCE TEAM  
Region V

Prepared by  
Kevin M. Pierard

3 June 1983

TDD NO. 5-8305-10  
PCS NO. 1106

## INTRODUCTION

On 18 May 1983 TAT was tasked to perform an inspection and review background information on the East Chicago/CITGO property. TAT member Kevin Pierard made the inspection on 26 May with OSC Pankanin. The CITGO facility is located in East Chicago, Indiana, on approximately 320 acres (Figure 1). The area of concern is an 80 acre site consisting of a partially dismantled, abandoned oil refinery.

## HISTORY

CITGO began operations at the facility in the late 1920s; the refinery portion was shut down in 1972 and partially dismantled between 1976 and 1980 by Lloyd Hodges. This activity exposed asbestos-covered debris and released large quantities of free asbestos. On 20 August 1980, the USEPA filed a complaint under RCRA, regarding the asbestos problem, against Hodges and CITGO. After this, Hodges removed two piles (approximately 200 yd<sup>3</sup>) of asbestos-laden material, then declared bankruptcy. There have been no subsequent cleanup activities at the site.

## SAMPLING

Sampling at the site was completed on 21 September 1982 by the EPA. A total of 17 samples were taken, 15 of which contained between 3% and 22% asbestos (Attachment 1). None of the samples were taken where fibrous materials were not obvious.

## SIZE HAZARDS

Due to the shape and small size of asbestos fibers, they may easily become airborne and remain so for long periods of time. There has been extensive documentation of the ability of airborne asbestos to cause cancer and lung damage through inhalation.

OSHA limits for employee asbestos exposure over an 8-hour period is 2 fibers, longer than 5 micrometers, per cubic centimeter of air. OSHA regulations set a ceiling concentration (one time exposure) limit at 10 fibers, longer than 5 micrometers, per cubic centimeter of air. The population within a one kilometer radius of the site is approximately 460, within 5 kilometers the population is 80,000.

## EPA RECOMMENDATIONS

The most recent remedial response program (14 April 1983) submitted by Jim Pankanin of Remedial Response to Frank Biros of the office of Waste Programs Enforcement (OWPE) for review includes:

I. The demolition of all standing structures on the asbestos waste site that are covered with asbestos insulation materials, in accordance with applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations, 40 CFR Part 61, Subpart B, and specific requirements set forth below. In particular, care should be taken to adequately wet the material during the entire demolition period and not to work during high winds. Asbestos materials shall not be dropped or thrown to the ground. The removed material should be properly bagged, labeled and disposed of at a state-licensed landfill. Vehicles leaving the site should be washed before leaving. Onsite traffic patterns for the demolition equipment shall be developed and approved by EPA in advance to avoid movement of the vehicles or equipment over asbestos material already on the ground.

II. Visible deposits of asbestos insulation materials are currently scattered throughout the site. The program requires that all visible deposits of asbestos insulation materials and the associated contaminated soils be wetted, scraped up, bagged, labeled and properly disposed of at a state-licensed landfill. All dismantled piping which is coated with deteriorated asbestos insulation materials should be wetted and hauled to a central onsite location to be completely stripped of the asbestos material. The removed material should be properly bagged, labeled and disposed of at a state-licensed landfill. Salvageable piping should not be disposed with the asbestos wastes. None of these asbestos handling operations shall be conducted under windy conditions.

A plan for onsite traffic patterns shall be reviewed and approved by EPA prior to undertaking the asbestos cleanup activities. The purpose of the plan shall be to avoid disruption and migration of the asbestos materials from contaminated areas to areas of the site that have been cleaned of asbestos materials. EPA and its contractors shall be allowed access to the site during working hours in order to inspect all ongoing cleanup operations and to ensure that each area of the site is appropriately cleaned of asbestos insulation materials before installation of any cover material to that area.

III. After completion of the cleanup required in Section II and inspection by EPA or its contractors, each area of the asbestos waste site shall be covered with an appropriate compacted cover material at least six (6) inches deep. Covering and compaction operations shall be done over small plots in order to minimize site disruption. Each area should be wetted before covering to minimize dust production. At least six (6) inches of additional top soil shall then be applied to each area. The topsoil should be seeded and revegetated as soon as possible to prevent erosion by wind or rain.

Any areas left uncovered shall be sampled to ensure that no analytically detectable asbestos material exists in those areas. All analytical work

shall be performed utilizing polarizing light microscopy with a detectable limit of one percent (1%) asbestos in soils. A sampling protocol shall be developed and submitted to EPA which utilizes a grid system to statistically determine that no analytically detectable asbestos material remains in those areas.

- IV. A notation shall be recorded on the deed to the site, or such other instrument which is normally examined in a title search, that will notify any potential purchaser of the property that the land has been contaminated with hazardous asbestos waste materials, and that any use of the site must not disturb the integrity of the final cover unless the Regional Administrator of U.S. EPA determines that adequate safety precautions will be implemented and that said disturbance will not increase the potential hazard to human health or the environment.
- V. The following measures shall be taken, commencing immediately, and lasting for the duration of the remedial response program:

- A. A penetrating sealant shall be applied to all exposed asbestos insulation remaining on the buildings and tanks, and the material on the ground shall be kept continuously wet. A spray system shall be installed to accomplish this end.
- B. Access to the asbestos waste site shall be restricted to authorized persons only, by fencing or other means.

Notices shall be posted at all entry points warning that the site contains asbestos materials.

- C. Persons entering the site shall be forewarned that the area contains asbestos materials, and such persons shall be advised in and given access to, the use of protective clothing, respirators and cleaning of all equipment used in the area.
- D. All personnel, vehicles, machinery and equipment shall be decontaminated upon leaving the site.
- VI. Continuous air monitoring must be performed both upwind and downwind around the perimeter of the active work site(s) whenever removal operations are underway. At least one sample from each air monitor shall be analyzed daily in accordance with OSHA-specified analytical procedures. Operations shall be curtailed whenever the air monitoring indicates asbestos levels above the following threshold limit values (TLV):

Amosite	0.5 fibers > 5 microns/cc
Chrysotile	2.0 fibers > 5 microns/cc
Crocidolite	0.2 fibers > 5 microns/cc
Other forms	2.0 fibers > 5 microns/cc

EPA shall be notified whenever these limits are exceeded. Operations shall not be restored until the source of the asbestos is investigated and the site is more completely wetted down.

- VII. Actions described herein shall be performed in accordance with a detailed scope of work plan that must be approved by EPA. Notices shall be given to EPA prior to undertaking actions described in paragraphs I, II, or III above, and EPA or its contractors shall be permitted access to the site to oversee such actions and to split samples if requested.

This program has not been approved by the OWPE nor has it been given to CITGO.

#### CLEANUP COST ESTIMATE

The costs associated with the remedial response program are outlined below. Costs were obtained from correspondence dated 12 May 1983, from Pankanin to Neuberger of Regional Counsel. These costs do not include costs for demolition of existing structures.

##### A. Disposal of asbestos materials scattered throughout site:

1. Collect coated piping; wet and strip  
(4 man crew) (\$17/hr) (8 hr/day) (10 days) = \$ 5,440  
(1 forklift + 1 truck) (\$200/day) (10 days) = 2,000
2. Manual cleanup of wetted asbestos throughout site  
(8 man crew) (\$17/hr) (8 hr/day) (10 days) = 10,880  
(1 truck) (\$100/day) (10 days) = 1,000
3. Rent 20 sludge box -1 2 yd<sup>3</sup> rolls  
(20) (\$150/day) (10 days) = 30,000
4. Transportation and disposal  
(20 loads) (\$50/load) = 1,000  
12 yd<sup>3</sup>-3 load) (20 loads) (\$17/yd<sup>3</sup>) = 4,080  
\$54,400

##### B. Covering site with compacted cover material) (6" thickness)

$$80 \text{ acres} \times 43,560 \frac{\text{ft}^2}{\text{acre}} \times 0.5 \text{ ft} \frac{(1 \text{ yd}^3)}{(27 \text{ ft})} \\ = 64,533 \text{ yd}^3$$

$$64,533 \text{ yd}^3 \text{ clay} \times \$3.00/\text{yd}^3 = \$193,600$$

Deliver clay in 16 yd<sup>3</sup> loads = \$201,650.00  
(\$50.00/load - 4,033 loads)

60 loads/day - 67 days - 14 weeks

Grade and compact soil during final eight (8)  
weeks using grader and bulldozer (to work in corners)

Grader - 40 days x \$40.00/hr x 8 hrs/day = \$ 12,800.00  
D6 (Dozer) - 40 days x \$45.00/hr x 8 hr/day= 14,400.00  
\$422,450.00

C. Cover site with top soil and vegetate

1. A variety of cover materials can be used as long as it will support vegetation. Sandy loam materials can be combined with fly ash or slag.

Assume costs are lower than clay = \$400,000.00  
Vegetation = 900.00  
\$400,900.00

D. Personnel

2 heavy equipment operators  
(\$28/hr) (8 hrs/day) (60 days) (2) = \$ 26,880.00  
Project supervisor  
(\$35/hr) (8 hr/day) (60 days) = 16,800.00  
Technician  
(\$17/hr) (8 hr/day) (60 days) = 8,160.00  
Safety equipment and monitoring  
(\$30/man) (4 men) (60 days) = 7,200.00  
\$ 59,040.00

TOTAL \$935,890.00

CONCLUSIONS AND RECOMMENDATIONS

The company has recently shown an interest in resolving the asbestos problem and has in fact submitted a plan to the EPA for demolition of existing structures and disposal of waste containing asbestos. The company stated (at the 26 May inspection) that they hoped to begin this portion of the cleanup on 15 June and complete it before 1 December. The plan is being reviewed by the EPA to assure compliance under NESHAP regulations (40 CFR, Part 61 subparts A and B).



We feel that the actions being taken are in the best interests of all parties concerned. We do not believe the site represents an emergency at this time if the structures present on site are demolished and removed in compliance with all applicable NESHAP regulations.

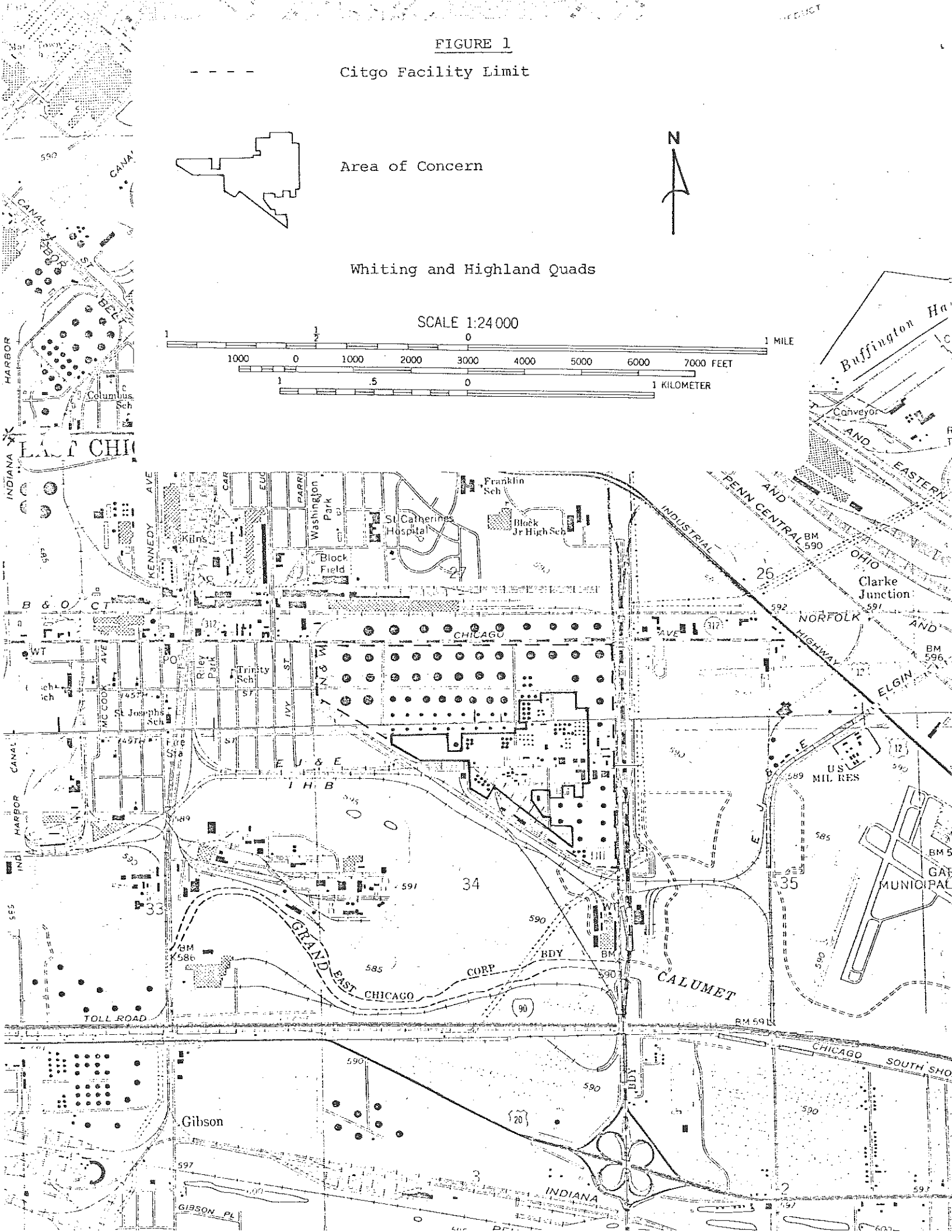
Covering of the site may be limited to small areas if the company handles asbestos materials carefully and removes soils which are obviously contaminated.

After this is completed, a comprehensive soil sampling program should be initiated to determine if soils in any other areas actually need to be removed or covered.

FIGURE 1

FIGURE 1

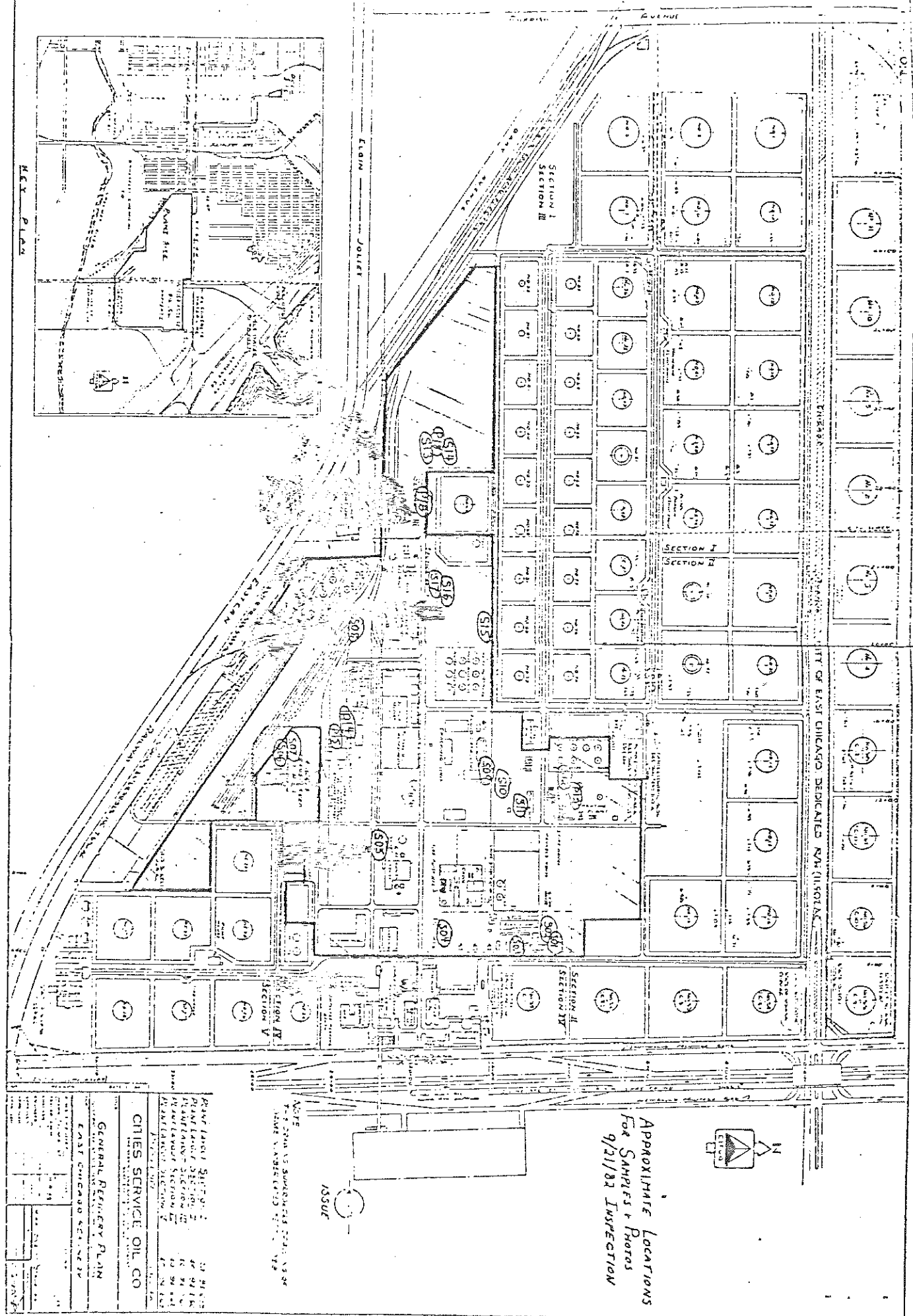
Citgo Facility Limit



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SAFETY PLAN

Region V  
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TDD# 5-8305-10

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4. Status Old Refinery
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6. Background Review: Complete ☒ Partial ☐  
If partial, why? \_\_\_\_\_
7. Hazard Level: High ☐ Moderate ☒ Low ☐ Unknown ☐  
Inhalation ☒ Ingestion ☐ Contact ☐ External ☐
8. Site Plan/Sketch Attached Yes ☐ No ☒
9. Background Material attached Yes ☐ No ☒

B. Material Description

1. Type: Liquid ☐ Solid ☒ Sludge ☐ Vapor/Gas ☐
2. Chemical Name/Class Asbestos (Amosite, Amphibole)
3. Characteristics: Corrosive ☐ Ignitable ☐ Volatile ☐  
Toxic ☒ Reactive ☐ Biological Agent ☐
4. Toxicity: TLV \_\_\_\_\_ IDLH \_\_\_\_\_
5. Special Hazards \_\_\_\_\_
6. Acute Exposure Symptoms Shortness of breath of gradually increasing intensity and a dry cough.

SMG:ss  
11/24/82



C. Site Description

1. Size 80 acres
2. Surrounding Population 460 within one Km.
3. Buildings/Homes \_\_\_\_\_
4. Topography Relatively flat
5. Receiving Waters Lake Michigan 1½ miles North
6. Weather 60° sunny
7. Unusual Features \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. Site History Site opened in the 1920's, refinery area closed  
in 1972 partially torn down between 1976 and 1980 releasing large  
quantities of asbestos.

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\_\_\_\_\_
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OVA _____	Other _____
4. Was protective level up or downgraded: Yes ☐ No ☒  
Up or Down graded to: A ☐ B ☐ C ☐ D ☐  
Why \_\_\_\_\_  
\_\_\_\_\_  
Actual Change: \_\_\_\_\_  
\_\_\_\_\_
5. Respirator Protective Equipment:  

SCBA _____	Canister Type _____
Gas Mask <u>x</u>	Cartridge Type <u>GMD-H Combination</u>
Ultra Twin <u>x</u>	
Dust Mask _____	
6. Protective Clothing:  

<u>Boot covers</u>	<u>Nitrile gloves</u>	_____
<u>Steel Toe Boots,</u>	<u>Hard Hats</u>	_____
<u>Tyvek suite</u>	<u>Ultra Twin</u>	_____

7. Field Monitoring Equipment and Materials:

None		

E. Decontamination Procedures

Remove disposable clothing, put clothing in plastic bag and dispose of on site.

1. Attach sketch showing Exclusion Zone, Contamination Reduction Zone, Support Zone and numerically labelled Decontamination Stations.
2. For each decontamination station note procedure and materials needed on an attachment page.

F. General Information

1. Team members

Kevin Pierard	

2. Site Safety Coordinator Kevin Pierard

G. Emergency Information

1. Have nearby people been evacuated: Yes ☒ No ☒  
If yes ever how large an area

2. First Aid Instructions Remove disabled person to uncontaminated area and treat ailment.

3. Sources of help

	Name	Town	Phone	Notified Yes No
Fire				
Police		East Chicago	392-8307	No
Ambulance		East Chicago	392 8420	No
Hospital				
Poison Information				
Airport				
Heliport				
Site Telephone	Citgo	East Chicago	398-0734	
Nearest Telephone	Citgo	East Chicago	398-0734	

4. Emergency Telephone Numbers

WESTON Hot Line  
WESTON NPO  
P. B. Lederman - NPM  
S. M. Gertz - HSO  
Medical Emergency  
EPA - ERT Emergency  
Chemtrec  
Central Disease Control  
National Pesticide  
Medical Emergency

215-524-1925 or 1926  
215-431-0797 or 0798 or 692-3030  
[REDACTED] (Home)  
513-421-3063 (National Service)  
201-321-6660  
800-424-9300  
404-329-3311 (day) 404-329-3644 (night)  
800-845-7633 (Regional Service)

Prepared by  
Date

K. Pi. J.  
6-2-83

Approved by  
Date

David J. Bell  
6-2-83

(For HSO Use Only)

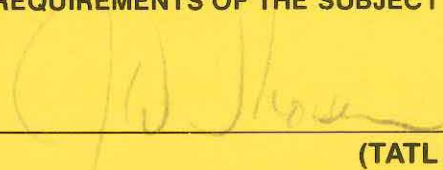


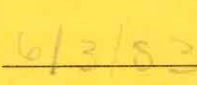
Reviewed and Comments \_\_\_\_\_

Action Required? Yes ☒ No ☒ If yes, what action \_\_\_\_\_

Followup carried out? Date \_\_\_\_\_

S. O. Signature

Date

<b>1. COST CENTER:</b>  <div style="text-align: center;">V</div>	<b>ACKNOWLEDGEMENT OF COMPLETION FOR TDD TAT EMERGENCY RESPONSE, REMOVAL AND PREVENTION  ROY F. WESTON, INC.</b>	<b>2. NO.: 5-8305-10</b>  <input type="checkbox"/> COMPLETE <input type="checkbox"/> INTERIM
<b>3. RESPONSE:</b> Enclosed please find the report on our investigation of the CITGO (Hodges) facility in East Chicago, Indiana. <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>		<input type="checkbox"/> FORMAL REPORT <input type="checkbox"/> LETTER REPORT <input type="checkbox"/> FORMAL BRIEFING <input type="checkbox"/> OTHER (SPECIFY)
<b>3A. ACTUAL TOTAL COST:</b>  <hr/>	<b>3B. ACTUAL TOTAL HOURS:</b>  <hr/>	
<b>4. DPO ACTION:</b> <input type="checkbox"/> ACCEPTED <input type="checkbox"/> ACCEPTED WITH EXCEPTIONS <input type="checkbox"/> REJECTED		
<b>5. COMMENTS:</b> <hr/> <hr/> <hr/> <hr/> <hr/>		
<b>6. I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.</b>  <div style="text-align: center;">         _____        (TATL SIGNATURE)     </div>		<b>7. DATE:</b>  <div style="text-align: center;">         _____     </div>
<b>8. I ACKNOWLEDGE THAT I HAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFIED IN THE SUBJECT TDD WITHIN ITS ORIGINAL OR REVISED TIME FRAMES.</b>  <div style="text-align: center;">         _____        (AUTHORIZING DPO SIGNATURE)     </div>		<b>9. DATE:</b>  <div style="text-align: center;">         _____     </div>